

Exhibit A

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February 29, 2024

Via ECF

The Honorable Pamela K. Chen,
United States District Court Judge,
U.S. District Court for the Eastern District of New York,
225 Cadman Plaza East,
Brooklyn, New York 11201.

Re: *Freeman v. HSBC Holdings plc*, No. 18-cv-7359-PKC-CLP (“*Freeman II*”)

Dear Judge Chen:

We represent Defendant Standard Chartered Bank (“SCB”) and write on behalf of the Appearing Defendants,¹ pursuant to the Court’s direction during the February 5, 2024 conference regarding Plaintiffs’ “constructive” discovery request, to object to (a) Plaintiffs’ First Request for the Production of Documents to Defendant Standard Chartered Bank (the “Request”), attached hereto as **Exhibit A**, and (b) Plaintiffs’ subpoena to non-party KBC Bank, attached hereto as **Exhibit B**.² Plaintiffs’ requests are the latest in a long line of attempts to leverage confidential SCB and KBC banking records to obtain impermissible post-dismissal discovery to formulate allegations in an amended complaint and engage in an improper “end run” around the protective order in *Bartlett v. Société Générale de Banque au Liban SAL*, No. 19-cv-00007 (E.D.N.Y.).

¹ In addition to SCB, the Appearing Defendants are HSBC Holdings plc; HSBC Bank plc; HSBC Bank Middle East Limited; HSBC Bank USA, N.A.; Barclays Bank PLC; Royal Bank of Scotland N.V. (f/k/a ABN AMRO Bank N.V.); Credit Suisse AG; and Commerzbank AG.

² Courts have allowed parties to oppose non-party subpoenas in situations analogous to this one. *See, e.g., Desilva v. N. Shore-Long Island Jewish Health Sys.*, 2010 WL 3119629, at *1 (E.D.N.Y. Aug. 9, 2010) (granting defendants’ application to quash plaintiffs’ non-party subpoenas where discovery had not yet commenced because “the issuance of the non-party subpoenas prior to the Rule 26(f) conference violate[d] Rule 26(d)(1),” which “expressly provides that ‘[a] party may not seek discovery from *any source* before the parties have conferred as required by Rule 26(f)’” (emphasis and alteration in original)); *Allstate Ins. Co. v. All County, LLC*, 2020 WL 5668956, at *2, *4 (E.D.N.Y. Sept. 22, 2020) (interpreting defendant’s motion to quash plaintiff’s overbroad non-party subpoena as a motion for protective order, and granting motion on grounds that (i) defendant “ha[d] standing to seek relief” “because the subpoenas s[ought] financial information about [defendant],” and (ii) “[i]n any event, the question of standing is beside the point where the objection to the subpoena is on relevance or proportionality—as [defendant’s] is”) (citations omitted).

(“*Bartlett*”). Plaintiffs should not be permitted to use the fact that their counsel obtained discovery (that came with use restrictions) in *Bartlett* to justify discovery that otherwise would not be permitted in this case under prevailing Second Circuit law, especially given that Plaintiffs and their counsel were not authorized to use material they obtained in the *Bartlett* case for this case. The Court should follow the Federal Rules of Civil Procedure and preclude Plaintiffs from obtaining post-dismissal and pre-amended-complaint discovery. While the requested discovery, even if permitted, would not provide any substantive support for Plaintiffs’ long-dismissed claims, the Appearing Defendants should not be required to defend a case brought using improperly obtained information.

As the Court recognized during the February 5 conference, courts in this Circuit do not permit a plaintiff to engage in any discovery in order to help formulate a complaint. (*Freeman II*, Conference Tr. 64:4–6 (“[T]he general principle that a plaintiff doesn’t get discovery when faced with a motion to dismiss to try to save it from that motion to dismiss applies as the general rule.”); *id.* at 49:9–12 (“[O]ne also could say those are the rules. I mean, that’s just how it works. If you didn’t have the information before you brought your complaint and it was dismissed, you’re out of luck.”).) The exception to that rule is where, unlike here, there is a threshold factual inquiry that the Court must engage in before deciding a motion to dismiss, such as the content of foreign law or the application of forum non conveniens factors. *See, e.g., Kashef v. BNP Paribas SA*, 2017 WL 2633580, at *1 (S.D.N.Y. June 15, 2017); *Alperin v. Vatican Bank*, 2006 WL 1663847, at *3 (N.D. Cal. June 15, 2006).

This rule against pre-motion-to-dismiss discovery applies with even more force where, as here, the Court has already dismissed all claims against the Appearing Defendants for failure to state a claim. *Main St. Legal Servs., Inc. v. Nat’l Sec. Council*, 811 F.3d 542, 567 (2d Cir. 2016) (“A plaintiff who has failed adequately to state a claim is not entitled to discovery.”); *Landon v. Cnty. of Orange*, 2009 WL 10740049, at *1 (S.D.N.Y. Aug. 27, 2009) (“If a plaintiff files a complaint containing a non-viable claim, it should not be rewarded with discovery opportunities unavailable to plaintiffs who appropriately refrain from bringing such claims.”); *KBL Corp. v. Arnouts*, 646 F. Supp. 2d 335, 346 n.6 (S.D.N.Y. 2009) (explaining that permitting post-dismissal, pre-amendment discovery “would undermine the purpose of” Rule 12(b)(6), which is designed “to streamline litigation by dispensing with needless discovery”). Indeed, even before their claims were dismissed more than three years ago, Plaintiffs were never authorized to conduct any discovery, making it even more inappropriate that they would be so authorized now.³

³ Plaintiffs have repeatedly conceded, even after the Supreme Court’s decision in *Twitter* issued, that discovery has not been authorized in this matter (or was “stayed” to the extent discovery from dismissed defendants can be stayed). (*See, Freeman II*, ECF No. 113 at 2 (arguing, post-*Twitter*, “to lift the stay of discovery”); ECF No. 120 at 3 (“renew[ing] their [post-*Twitter*] request that the Court lift the stay of discovery”); ECF No. 124 (replying, post-*Twitter*, about the “seemingly pedestrian legal question of whether the stay of discovery should be lifted”).) Indeed, discovery has been stayed in this case since the inception of its predecessor case, *Freeman et al v. HSBC Holdings PLC et al.*, 1:14-cv-06601-PKC-CLP (“*Freeman I*”). (*See Freeman I*, ECF No. 37 (“Discovery held in abeyance pending motion practice.”); *Freeman II*, Minute Entry Dated May 30, 2019 (“Further proceedings in *Freeman II* . . . will be stayed until [the Court decides Defendants’ motion to dismiss.]”); *Freeman II*, Docket Order dated Oct. 10, 2019 (extending

Moreover, Plaintiffs and their counsel were expressly precluded from using confidential discovery material they obtained in the *Bartlett* case for this case. Indeed, the *Bartlett* court made clear in orders issued on September 27, 2023, and December 21, 2023, that (i) the SCB and KBC records Plaintiffs now seek to deploy in this case are subject to the *Bartlett* Protective Order, and (ii) the *Bartlett* plaintiffs and their counsel were not entitled to use SCB's confidential records for any purpose other than litigating the *Bartlett* case.⁴ (*Bartlett*, Minute Entry and Order dated Sept. 27, 2023; ECF No. 368.) The *Bartlett* Protective Order plainly states that “[a]ll Discovery Material (or any copies, summaries, or abstracts thereof) shall be used *solely* for the purpose of conducting [the *Bartlett*] Litigation,” absent the *Bartlett* Court’s specific “permission to use Discovery Material in another case or matter.” (*Bartlett*, ECF No. 273 at 3 (emphasis added).) Plaintiffs’ counsel here sought, and was denied, that permission from the *Bartlett* Court twice, including on appeal. In other words, the *Bartlett* Protective Order expressly forbade the *Bartlett* plaintiffs and their counsel—who overlap with Plaintiffs and counsel here—from using these very materials *for any purpose* outside of *Bartlett*, and when counsel here challenged that express restriction, the *Bartlett* court affirmed that the *Bartlett* Protective Order meant what it said.

Undeterred, Plaintiffs did exactly what the *Bartlett* court’s orders forbid. On December 27, 2023, Plaintiffs filed their 704-page Second Amended Complaint (“SAC”), which contains 47 pages of redacted “allegations” that Plaintiffs admit were derived from confidential discovery in *Bartlett*. (*Freeman II*, ECF No. 117, at 3 n.5.) Plaintiffs then leveraged their own misuse of *Bartlett* discovery to try to justify post-dismissal, pre-motion-to-dismiss discovery in this case. On January 8, 2024, Plaintiffs renewed a request to “constructively ‘subpoena’” themselves in a transparent attempt to back-fill the SAC with these same materials. (*Freeman II*, ECF No. 120 at 1, 3.) During the February 5 conference, the Court rightly rejected this request, observing that “there’s really no such thing,” and that “it would end up being an end run around the protective order that exists in [*Bartlett*].” (*Freeman II*, Conference Tr. 6:17–22.) The Court instead allowed Plaintiffs to provisionally request documents from SCB and KBC, based in part on the representation of Plaintiffs’ counsel that “[a]t this stage, we’re not seeking anything beyond what essentially underlies the redacted allegations in the complaint.” (*Id.* at 10:7–11.) Although the Court allowed Plaintiffs to make limited provisional discovery requests to SCB and KBC, the Court also permitted SCB and the Appearing Defendants an opportunity to object to and “quash” the discovery requests and to raise the issue directly with the court in *Bartlett*, which SCB is doing. (*Freeman II*, Minute Entry dated Feb. 6, 2024.)

proceedings until “30 days after the Court rules on the motion for partial reconsideration in [*Freeman I*]”); *Freeman II*, Minute Entry dated Jan. 28, 2021 (“At the request of Plaintiffs, the Court stayed the case pending the Second Circuit’s decision in *Freeman I*”); *Freeman II*, Docket Order dated Aug. 16, 2021 (directing the parties “to confer and inform the Court how they wish to proceed” within 30 days after the Second Circuit deciding *Freeman I*); *Freeman II*, Docket Order dated Feb. 16, 2023 (“granting the Parties’ request for a stay of all three cases (*Freeman I*, *Freeman II*, and *Bowman*) pending the Supreme Court’s decision in *Twitter v. Taamneh*, No. 21-1496”).

⁴ Judge Merkl’s ruling expressly applied both to records produced by SCB and records produced by KBC Bank. (*See Bartlett*, Minute Order dated Oct. 13, 2023.)

Subsequently, on February 15, 2024, Plaintiffs sent SCB a document request, which, contrary to what Plaintiffs had represented to the Court, is far from limited to information Plaintiffs have used in their redacted SAC. Rather, the request seeks “[a]ll Transactional Records that are or were located in the United States relating to any of the persons and entities listed on the attached Exhibit 1, in which Standard Chartered Bank was a Participant,” for a 19-year period. (Ex. A at 3.) The referenced “Exhibit 1” spans 33 pages and lists 361 individuals and 321 entities, regardless of whether those individuals or entities have anything to do with the allegations in the SAC (Ex. A, Ex. 1), thus revealing Plaintiffs’ effort for what it is—a desperate attempt to fish for discovery that may somehow help them argue that the Court should revive their long-dismissed claims.

There is—at a minimum—good cause to deny the discovery that Plaintiffs seek. *Walsh v. Versa Cret Contracting Co., Inc.*, No. 21-CV-5697, 2022 WL 2987086, at *2 (E.D.N.Y. July 28, 2022) (“Rule 26(c) confers broad discretion on the trial court to decide when a protective order is appropriate and what degree of protection is required.”); *Sharpe v. Cnty. of Nassau*, No. 15-6446, 2016 WL 7350690, at *4 (E.D.N.Y. Dec. 19, 2016) (“Generally, the Court may issue a protective order where ‘good cause’ has been established . . . by setting forth particular and specific facts.”).

First, Plaintiffs’ only stated justification for seeking this discovery is to un-redact the phantom allegations they included in their SAC in contravention of the *Bartlett* Protective Order. However, as courts in this Circuit have routinely held, “a plaintiff’s desire to gain more information in order to generate stronger pleadings is not a legitimate basis to compel discovery at this early stage,” and courts in this Circuit “have consistently denied discovery requests which are lodged for the purpose of obtaining extra information prior to amending a complaint.” *K.A. v. City of New York*, 2021 WL 5889254, at *2 (S.D.N.Y. Dec. 13, 2021) (collecting cases). There is no reason to deviate from this well-recognized rule, which reflects how Rules 8 and 12 of the Federal Rules of Civil Procedure are meant to work.

Second, and as explained in SCB’s January 16, 2024 Letter (*Freeman II*, ECF No. 123), the Second Circuit has squarely held that “[a] plaintiff who has failed adequately to state a claim is not entitled to discovery.” *Main St. Legal Servs., Inc. v. Nat’l Sec. Council*, 811 F.3d 542, 567 (2d Cir. 2016). This Court ruled more than three years ago that Plaintiffs had not stated any claim against any of the Appearing Defendants. Moreover, the Appearing Defendants anticipate renewing their motion to dismiss the SAC for failure to state any claim. “If a plaintiff files a complaint containing a non-viable claim, it should not be rewarded with discovery opportunities unavailable to plaintiffs who appropriately refrain from bringing such claims.” *Landon*, 2009 WL 10740049, at *1. Permitting post-dismissal, pre-motion-to-dismiss discovery “would undermine the purpose of” Rule 12(b)(6), which is designed “to streamline litigation by dispensing with needless discovery.” *KBL Corp.*, 646 F. Supp. 2d at 346 n.6.

Third, the current discovery requests to SCB and KBC and Plaintiffs’ phantom redacted allegations in the SAC are premised on a violation of the *Bartlett* Protective Order, which this Court should not endorse or facilitate. The *Bartlett* Protective Order makes clear that “[a]ll Discovery Material (or any copies, summaries, or abstracts thereof) shall be used *solely for the purpose of conducting this Litigation* (including for purposes of mediating or otherwise attempting to settle this Litigation).” (*Bartlett*, ECF No. 273 at 3 (emphasis added).) Indeed, the *Bartlett*

court has already held that the precise conduct that Plaintiffs have engaged in here is forbidden under the *Bartlett* Protective Order, explaining that “the *Freeman* plaintiffs are seeking to use the discovery in *Bartlett* to revive a case where they have been denied discovery to support a proposed amended complaint. . . . [T]he *Freeman* parties at this stage in their litigation have not been permitted to engage in discovery. Therefore, the prejudice of using SCB’s third-party disclosures in *Bartlett* to establish a cause of action against SCB in another case is apparent.” (*Bartlett*, ECF No. 368 at 10–11.)

Fourth, even if some discovery were appropriate (and it plainly is not), Plaintiffs’ request is wildly overbroad. It seeks documents that fall far beyond what Plaintiffs told the Court they would seek—namely, “what *essentially underlies the redacted allegations* in the complaint.” (*Freeman II*, Conference Tr. 10:7–10(emphasis added).) Nor does Plaintiffs’ instruction that SCB “may respond to the [Request] by producing, or consenting to the transmittal of, the same information [SCB] previously produced in response to the subpoena served on [SCB] in [*Bartlett*]” (Ex. A at 2) save the Request. To the contrary, even that instruction is unreasonably overbroad and outside the scope of what the Court has authorized them to request. The redacted phantom allegations in the SAC were—according to Plaintiffs—derived from only a subset of the records produced in *Bartlett*, which Plaintiffs’ counsel could have readily identified but failed to do so. There is no legitimate reason for Plaintiffs here to obtain tens of thousands of confidential banking records that Plaintiffs did not even use for their SAC. The same applies to the KBC subpoena, which is similarly not limited to the material underlying the redactions.

In short, Plaintiffs are not entitled to post-dismissal, pre-motion-to-dismiss discovery under clear, binding Second Circuit law. Nor should Plaintiffs be permitted to leverage their own *misuse* of confidential discovery obtained in *Bartlett* as justification for discovery that is not otherwise authorized under the Federal Rules of Civil Procedure. To hold otherwise would not only undermine the very purpose of protective orders, but also encourage plaintiffs’ counsel—particularly those like counsel here, which represents hundreds of plaintiffs in many similar lawsuits against different defendants—to disregard the Federal Rules of Civil Procedure and unilaterally commingle discovery materials across cases, if it suits them. Such precedent would have real and immediate impact. Accordingly, the Appearing Defendants respectfully request that the Court order that SCB and KBC need not respond to Plaintiffs’ discovery requests.

As stated at the February 5 conference, Plaintiffs’ redacted allegations do not remotely support a claim under the Anti-Terrorism Act. While Plaintiffs should have never misused SCB’s and KBC’s banking records to help formulate their SAC, as an alternative to denying Plaintiffs the discovery they seek, should the Court be inclined to consider the SAC’s phantom allegations, SCB respectfully requests that the Court (i) limit the scope of discovery only to the specific banking records from which Plaintiffs sourced the redacted allegations in the SAC; and (ii) require that any such information be kept confidential by the *Freeman II* parties and those portions of the SAC be filed under seal in *Freeman II*.

The Honorable Pamela K. Chen

-6-

Respectfully,

/s/ Andrew J. Finn
Andrew J. Finn

(Exhibits)

cc: All counsel of record (via ECF)

Exhibit A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
KATHALEEN FREEMAN, *et al.*,

Plaintiffs,

-against-

HSBC HOLDINGS PLC, *et al.*,

Defendants.
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Case No. 18-cv-7359 (PKC)(CLP)

**PLAINTIFFS' FIRST REQUEST FOR THE
PRODUCTION OF DOCUMENTS TO DEFENDANT STANDARD CHARTERED BANK**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs hereby request that defendant Standard Chartered Bank ("SCB" or "Defendant") in the above-captioned litigation produce and permit Plaintiffs to inspect and copy all of the following documents and things which are in the possession, custody, or control of Defendant, and/or Defendant's agents or attorneys, within thirty (30) days following the date of service of this document request.

DEFINITIONS

As used herein, the following terms are defined as indicated:

- a. "All/Each" is synonymous with the definition contained in Local Rule 26.3 of the Local Rules.
- b. "Document" is synonymous with the definition contained in Local Rule 26.3(c)(2) of the Local Rules.
- c. "Participant" means Defendant's name or Business Identifier Code (or other reference to Defendant) appears on a Transactional Record.
- d. "Standard Chartered Bank" means Standard Chartered Bank and the scope of the definition is the same as the definition of "Parties" contained in Local Rule 26.3 of the Local Rules.
- e. "Transactional Records" includes any S.W.I.F.T. Messages, CHIPS Payment Messages, FedWire Payment Messages, Continuous Linked Settlement (CLS) Bank Messages, Telex Messages, and any internal payment system messages reflecting requests for or actual payments, payment orders, bills of exchange, checks including interbank checks, financial institution transfers, including banknote transfers,

documentary credits and guarantees, bank guarantees, letters of credit, and other wholesale transfers of value, regardless of whether they are or were blocked by law or Your policies.

- f. “You” and “Your” refer to Defendant and its directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, or investigators, or its attorneys or their agents, employees, representatives or investigators.

INSTRUCTIONS

1. You are to furnish all responsive Documents or things in Your possession, custody, or control, regardless of whether such Documents are in the possession, custody, or control of You or Your directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, or investigators, or by Your attorneys or their agents, employees, representatives, or investigators.
2. All requested Documents must be produced in full. If any requested Document or thing cannot be produced in full, You are to produce it to the extent possible, indicating which Document, or portion of such Document, is being withheld, and the reason that Document is being withheld.
3. All Documents shall be produced in the same order as they are kept or maintained by You in the ordinary course of Your business.
4. Documents attached to each other should not be separated.
5. If a Document once existed and has subsequently been lost, destroyed, or is otherwise missing, please provide sufficient information to identify the Document and state the details concerning its loss.
6. If You claim the attorney-client privilege or any other privilege or work product protection for any Document, You shall provide a detailed privilege log that contains at least the information required by Local Rule 26.2(a)(2)(A) of the Local Rules for each Document that You have withheld.
7. The relevant time period with respect to the document request herein is January 1, 2003, through December 31, 2021 (the “Relevant Time Period”).
8. To minimize Your burden, You may respond to the document request herein by producing, or consenting to the transmittal of, the same information You previously produced in response to the subpoena served on You in *Bartlett v. Société Générale De Banque Au Liban SAL*, No. 19-cv-7 (CBA) (VMS), to the Plaintiffs in this Action.
9. If You choose to search for records notwithstanding paragraph 8, for all persons or entities listed on Exhibit 1, search for the names as well as a/k/a formulations. To minimize Your

burden, You may also consult Plaintiffs' counsel on spellings and additional identifying details that may assist Your search.

10. In searching the names of persons identified below, You shall also search other commonly used transliterations of Arabic names, including without limitation:

Baqir	Baker, Baaqir, Baqer, Baaker, Baaqer
Darwish	Darvish, Darwich, Darwiche
Hoda	Huda, Houda, Houdaa, Hodaa, Hudaa, Hady
Hussein	Husain, Hussain, Husayn, Husein
Issam	Isam, Issaam, Esam, Esaam, Essaam, Esame, Esamm, Esamme, Esaame, Esaamm, Esaamme
Issawi	Isawi, Issaoui
Kassim	Qasim, Qaasim, Qazeem, Quasim, Casim, Cassim, Kacem, Kasem, Kassem, Kassym, Qasem, Kasim, Qassim, Ghasem, Kassam, Qazeem, Kaseem, Kasseem, Qaseem, Kasim, Qazim
Muhammad	Mohammad, Mohamad, Mohamed, Mohammed, Muhammed, Muhamad, Muhamed, Mohummad, Mohummed, Mouhamed, Mohammad, Mouhamad, Mohamud
Musa	Moosa, Musaa, Moosaa, Musaa, Mousa, Mousaa, Moussa, Mowsa, Mowsaa, Muwsa, Muwsaa, Moosa
Nazim	Nazem, Nadhem, Nadhim, Nathum
Said	Sayed, Saeed, Saed, Saied, Sai'd, Sa'id
Saleh	Salah, Salih, Sahlay, Sauleh
Seada	Saada
Tajideen	Tajeddine, Taj al-Din, Tajudeen
Wa'el	Wael, Wa'il, Wail, Wael, Waail, Waeil, Waele, Waelle, Wael, Waail
Ya'qub	Yakub, Yaqub, Yaacoub, Yaqoob, Yaqoub, Yakoub, Yakup, Yukub, Yakubbe, Yakoob, Yakob, Jakob, Yacob, Jacob, Yakube, Yakubb, Yakubbe, Yakub
Youssef	Yusuf, Yussuf, Yosef, Yoosuf, Yusif, Yusef, Yoosef, Yousuf, Yousef, Yosoph, Yosof, Yosouf, Yosuwf, Yosowf, Yosuph, Yosuf, Yousof, Yousouf

DOCUMENTS REQUESTED

1. All Transactional Records that are or were located in the United States relating to any of the persons and entities listed on the attached Exhibit 1, in which Standard Chartered Bank was a Participant.

Date: February 15, 2024

By: /s/ Dina Gielchinsky

OSEN LLC

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Michael Elsner, Esq.
John Eubanks, Esq.
28 Bridgeside Boulevard, P.O. Box 1792
Mount Pleasant, SC 29465

Attorneys for Plaintiffs

EXHIBIT 1

a. Persons:

- 1) Yusuf Aasi a/k/a El Yusuf Abd al-Rida Asi a/k/a Sheikh Yusuf Aasi a/k/a Youssef Abdel Rida Assi
- 2) Attiya Muhammad Abbas a/k/a Attiyah Muhammad Abbas a/k/a Attiya Tabaja a/k/a Attiyah Tabajah a/k/a Atiya Muhammad Abbas
- 3) Taleb Muhammad Ali Abou-Zeinab
- 4) Abdel Karim Youssef Ahmad a/k/a Abd al-Karim Yusuf Ahmad.
- 5) Adel Hassan Makki Ahmad a/k/a Adel Hassan Makki a/k/a Adel Makke
- 6) Afif Ahmad Ahmad a/k/a Afif Ahmad Ali Ahmad
- 7) Ali Ahmad Ahmad a/k/a 'Ali Ahmed Ahmed
- 8) Ali Sa'id Ali Ahmad a/k/a Ali Said Ali Ahmad a/k/a 'Ali Said Ali Ahmed
- 9) Diana Nassour Ahmad a/k/a Diana Nassour
- 10) Firas Nazim Ahmad a/k/a Firas Nazem Ahmed
- 11) Hassan Said Ali Ahmad a/k/a Hassan Sa'id Ali Ahmad
- 12) Hind Nazim Ahmad a/k/a Hind Nazem Ahmed
- 13) Hussein Said Ali Ahmad a/k/a Hussein Sa'id Ali Ahmad
- 14) Ibtisam Said Ali Ahmad a/k/a Ibtisam Sa'id Ali Ahmad
- 15) Imad Suleiman Ahmad a/k/a 'Imad Suleiman Ahmad
- 16) Issam Suleiman Ahmad a/k/a Issam Sueliman Ahmad a/k/a Essam Suleiman Ahmad
- 17) Hassan Ahmad Ahmad a/k/a Hasan Ahmad Ahmad
- 18) Hind Abbas Ahmad a/k/a Hind Abas Ahmed
- 19) Hismahan Ahmad Ahmad a/k/a Hismahan Ahmad Ali Ahmad
- 20) Lina Ahmad Ahmad a/k/a Lina Ahmad Ali Ahmad
- 21) Mahmoud Nayef Ahmad a/k/a Mahmoud Nayef Ahmad a/k/a Mahmoud Na'if Ahmed

- 22) Maryam Suleiman Ahmad a/k/a Maryam Suleiman Ali Ahmad
- 23) Maya Ahmad a/k/a Maya Imad Suleiman Ahmad
- 24) Mohammad Samir Ali Ahmad a/k/a Muhammad Samir 'Ali Ahmed
- 25) Muhammad Said Ali Ahmad a/k/a Muhammad Sa'id Ali Ahmad
- 26) Muhsin Ali Ahmad a/k/a Muhsin 'Ali Ahmed
- 27) Muna Said Ali Ahmad a/k/a Muna Sa'id Ali Ahmad a/k/a Mona Said Ali Ahmad.
- 28) Musa Ahmad Ahmad
- 29) Musa Muhammad Ahmad a/k/a Moussa Mohamad Ahmad
- 30) Mustafa Faysal Ahmad a/k/a Mustapha Ahmad a/k/a Mustafa Faisal Ahmad
- 31) Nadia Ahmad Ahmad a/k/a Nadia Ahmad Ali Ahmad
- 32) Najwa Suleiman Ahmad
- 33) Nawal Ali Ahmad a/k/a Nawal Ali Suleiman
- 34) Nazim Said Ali Ahmad a/k/a Nazim Ahmad a/k/a Nazem Ibrahim Ahmad a/k/a Nazim Sa'id Ali Ahmad a/k/a Nazem Saeed Ahmad a/k/a Nizam Saed 'Ali Ahmed a/k/a Nazem Saied Ahmad
- 35) Rasha Ali Ahmad a/k/a Risha 'Ali Ahmed
- 36) Said Ali Ahmad a/k/a Sa'id 'Ali Ahmad
- 37) Salman Ali Ahmad
- 38) Seada Said Ali Ahmad a/k/a Seada Sa'id Ali Ahmad
- 39) Sleiman Ali Ahmad
- 40) Suleiman Ali Ahmad a/k/a Sulaiman Ali Ahmad a/k/a Sulayman Ali Ahmad
- 41) 'Taysir Suleiman Ahmad a/k/a 'Tayseer Suliman Ahmad
- 42) Youssef Ali Ahmad a/k/a Yusuf Ali Ahmed
- 43) Qassem Muhammad Ajami a/k/a Qasim Muhammad Ajami a/k/a Qasem Muhammad Ajami a/k/a Kassem Muhammad Ajami

- 44) Ezzat Youssef Akar a/k/a Izzat Akar a/k/a Izzat Youssef Akar a/k/a Izzat Yusuf Akkar
- 45) Yahya Muhammad al-Abd-al-Muhsin a/k/a Abd-al-Muhsin a/k/a Yahya Muhammad Alabdulmohsen a/k/a Yahya Muhammad Al-Abd-Al-Mushin a/k/a Yahya Muhammad Al-Abu Haydar a/k/a Yahya Sayyid
- 46) Qasim Aliq a/k/a Qassem Aliq a/k/a Kassem Aleik a/k/a Hajj Qasim Aliq a/k/a Qasem Aliq a/k/a Qasim Ulayq a/k/a Qasem Mahmud Aliq
- 47) Muhammad Abdallah al-Amin a/k/a Mohamed Abdullah al-Ameen a/k/a Mohammad al-Amin a/k/a Muhammad Abdallah Alamin a/k/a Muhammed El Amine a/k/a Mohamed Abdalla Amine
- 48) Ibrahim al-Amin al-Sayyed a/k/a Ibrahim Amin al-Sayid a/k/a Ibrahim Amin Sayyed a/k/a Ibrahim al-Amin
- 49) Wafa Muhammad Nussar Alamah a/k/a Wafa' Muhammad Nussar 'Alamah
- 50) Ali Reda Hassan Al-Banai a/k/a Ali Reda Hassan Albanai a/k/a Ali Ridha Hasan Albanai a/k/a Ali Ridha Hasan Al-Banai a/k/a Ali Reda Hassan Al-Banay a/k/a Ali Ridha Hassan Al-Banay a/k/a Ali Reda Hassan Al-Bani a/k/a Ali Ridha Hassan Al-Bani a/k/a Ali Reda Hassan Al-Bannay a/k/a Ali Ridha Hassan
- 51) Sulaiman Al-Banai a/k/a Sulaiman Abdulkaliq Al-Banai a/k/a Sulayman Abd-al-Khaliq Al-Banai a/k/a Sulaiman Albanai a/k/a Sulaiman Abdulkaliq Albanai a/k/a Sulayman Abd-al-Khaliq Al-Albanai
- 52) Akram Ahmad al-Bast a/k/a Akram Ahmed el-Bast
- 53) Hasan Jamal al-Din a/k/a Hassan Jamaledine
- 54) Hussein Muhammad Kheir al-Din a/k/a Hussein Muhammad Kheir-al-Din a/k/a Hussein Muhammad Kheir-Addin
- 55) Isam Abd al-Amir Izz al-Din a/k/a Isam Abd al-Amir Izz-al-Din
- 56) Muhammad Ali Izz al-Din a/k/a Muhammad 'Ali Izz-al-Din a/k/a Mohamad Ali Ezzedine
- 57) Muhammad Amin Badr al-Din a/k/a Muhammad Badr-Al-Din a/k/a Mohamed Badreddine a/k/a Mohammed Badreddine
- 58) Muhammad Ni'mah Shams al-Din
- 59) Salah Abd al-Rauf Izz al-Din a/k/a Salah Abd al-Rauf Azz al-Din a/k/a Salah Abd al-Ra'uf Ezzadin

- 60) Ahmad Jawad Shalash al-Fartusi
- 61) Ali Hussein al-Haj a/k/a 'Ali Hussein el-Hajj
- 62) Hussein al-Khalil a/k/a Husayn Al-Khalil a/k/a Hussein el-Khalil
- 63) Fadi Dawud al-Nimr a/k/a Fadi Dawood al-Nimr
- 64) Abdallah Zuhayr al-Sahili a/k/a Abdallah Zouhair al-Sahili
- 65) Samira Muhammad al-Sahili a/k/a Samira Mohammed Al Sahli a/k/a Samirah Muhammad al-Saheli
- 66) Muhammad Ali al-Seblani a/k/a Muhammad Ali al-Sablani a/k/a Muhammad Ali al-Siblani
- 67) Muhammad Arkan al-Seblani a/k/a Muhammad Irkan al-Sablani a/k/a Muhammad Arkan Siblani
- 68) Hussein Ali Muhammad al-Shami a/k/a Husayn al-Shami a/k/a Husayn Shaimi a/k/a Husayn Shamai a/k/a Husayn Shamy a/k/a Husayn Al-Shamy a/k/a Husayn Ashami a/k/a Haj Husayn Al-Shami
- 69) Maitham Muhsin Ubayd al-Zaydi a/k/a Maitham Mohsen Obaid Al-Zaidi
- 70) Shibl Muhsin Ubayd al-Zaydi a/k/a Shebl Mohsen Al Zaidi a/k/a Shibl Muhsin Ubayd Al-Zadi a/k/a Hajji Shibl Muhsin Al-Zaydi a/k/a Shibl Muhsin 'Ubayd Al-Zaydi a/k/a Mahdi Ja'far Salih
- 71) Ahmad Hisham Amhaz a/k/a Ahmed Hisham Amhaz
- 72) Ali Muhammad Amhaz a/k/a 'Ali Mohammed Amhaz
- 73) Hani Amhaz a/k/a Hani Muhammad Amhaz a/k/a Hani Muchamad Amhaz a/k/a Hani Muchammad Amhaz a/k/a Hani Mohamed Amhaz a/k/a Hani Mohammed Amhaz a/k/a Hany Muhammad Amhaz
- 74) Hussein Ahmad Amhaz a/k/a Husayn Ahmad Amhaz
- 75) Issam Amhaz a/k/a Issam Mohamed Amhaz a/k/a 'Isam Amhaz
- 76) Kamel Muhammad Amhaz a/k/a Kamel Mohamed Amhaz a/k/a Kamel Amhaz a/k/a Kamel Al-Amhaz a/k/a Kamil Amhaz
- 77) Meghdad Amini
- 78) Sultan Khalifa As'ad a/k/a Hajj Sultan Asaad a/k/a Sultan Assad a/k/a Sultan Khalife Assad

- 79) Abd al-Ilah Mahmud Ashur a/k/a Abd-al-Alah Mahmud Ashur a/k/a Abdel Ilah Mahmoud Achour
- 80) Nabil Mahmoud Assaf a/k/a Nabil Assaf a/k/a Nabil Muhammad Assaf
- 81) Clara Saleh Assi a/k/a Clara Saleh Asi a/k/a Clara Salih Assi a/k/a Clara Salah Assi a/k/a Clara Salih Asi a/k/a Clara Salah Asi
- 82) Najat Bou Joumaa Assi a/k/a Najat Bu Jumaa Khalid a/k/a Najat Bou Joumaa Asi a/k/a Najat Bu Jumaa Asi
- 83) Saleh Ali Assi a/k/a Salih Ali Assi a/k/a Salah Assi a/k/a Saleh Ali Asi /k/a Salih Ali Asi a/k/a Salah Ali Asi
- 84) Reda Ali Atawi a/k/a Rida 'Ali Atawi
- 85) Hassan Muhammad Attiya a/k/a Hasan Mohamed 'Attiya
- 86) Nour al-Ain Muhammad Ali Atweh a/k/a Nur al-Ayn Muhammad Ali Utwah a/k/a Nur al-Ain Muhammad Ali Atweh a/k/a Nur al-Ain Muhammad Ali Atwi a/k/a Nour Tajideen a/k/a Nour Taj al-Din
- 87) Hussein Ali Atwi a/k/a Husayn 'Ali Atawi
- 88) Hassan Mussa Awada a/k/a Hasan Mussa Awada a/k/a Hassan Musa Awadah
- 89) Mahdi Ali Awada a/k/a Mahdi Ali Awadah
- 90) Majida Zayna Ahmad Awada a/k/a Majdah Zaynah Ahmed Awadeh
- 91) Ali Muhammad Hasan Ayash a/k/a Ali Muhammad Hassan Ayyash
- 92) Hassan Muhammad Hasan Ayash a/k/a Hassan Muhammad Hassan Ayyash a/k/a Hasan Muhammad Hasan Ayash a/k/a Hassan Mahmoud Ayache
- 93) Imad Abdul Reda Bakri a/k/a Imad Abd al-Rida Bakri a/k/a Imad Kebir
- 94) Rami Kamil Ya'qub Baqir a/k/a Rami Baker a/k/a Rami Kamel Yaaqub Baqer
- 95) Rim Reda Baqir a/k/a Rim Baker a/k/a Rim Baqer a/k/a Rim Reda
- 96) Rima Kamil Ya'qub Baqir a/k/a Rima Baker a/k/a Rima Baqer
- 97) Muhammad Ali Bashir a/k/a Muhammad Ali Bachir
- 98) Nader Nasim Basma a/k/a Nadir Nasim Basmah a/k/a Nadir Nassim Basmah a/k/a Nadir Nasim Basma a/k/a al-Hajj Nader Basma

- 99) Muhammad Ibrahim Bazzi a/k/a Mohammad Ibrahim Bazzi a/k/a Muhammad Ibrahim Bazzi a/k/a Muhammad Bazzi
- 100) Qassem Muhammad Ali Bazzi a/k/a Kassem Mohamad Ali Bazzi a/k/a Qassem Mohammed Ali Bazi a/k/a Qasim Mohammed Ali Bazzi a/k/a Qasim Muhammad Ali Bazzi
- 101) Wa'el Muhammad Bazzi a/k/a Wa'il Muhammad Bazzi a/k/a Wael Bazzi
- 102) Ibrahim Hussein Bdeir a/k/a Ibrahim Hussein Budayr a/k/a Ibrahim Husayn Bdeir a/k/a Ibrahim Husayn Budayr
- 103) Hussein Ibrahim Bdeir a/k/a Husayn Ibrahim Bdeir a/k/a Hussein Abu Ali Bdeir a/k/a Hussein Budayr a/k/a Husayn Bdeir
- 104) Muhammad Ahmad Berjawi
- 105) Basel Nabih Berri a/k/a Bassel Nabih Berri
- 106) Jalal Muhammad Rashed Bitar
- 107) Nasser Jalal Bitar
- 108) Wa'el Jalal Bitar a/k/a Wa'il Jalal Bitar a/k/a Wael Jalal Bitar
- 109) Amine Bzeih a/k/a Amin Bazi'
- 110) Talal Khalil Chahine a/k/a Talal Shahin a/k/a Tilal Khalil Shahin
- 111) Abd al-Halim al-Shaykh Musa Charara a/k/a/ Abd al-Halim Sharara
- 112) Ali Ibrahim Charara a/k/a Ali Ibrahim Sharara
- 113) Ali Youssef Charara a/k/a Ali Youssef Sharara a/k/a 'Ali Yusuf Sharara
- 114) Muhammad Yousef Charara a/k/a Muhammad Youssef Sharara a/k/a Muhammad Yusuf Sharara
- 115) Raghid Wasif Charara a/k/a Raghid Wasif Sharara a/k/a Raghid Wasef Sharara
- 116) Rami Ibrahim Charara a/k/a Rami Ibrahim Sharara
- 117) Youssef al-Shaykh Abd al-Amir Charara a/k/a Youssef Sharara
- 118) Adel Muhammad Cherri a/k/a Adel Mohamad Cherri a/k/a Adel Muhammad Sherri a/k/a Adel Muhammad Shary

- 119) Amin Muhammad Cherri a/k/a Amin Muhammad Shary, a/k/a Amin Shari a/k/a Amin Shary a/k/a Amin Muhammad a/k/a Ameen Shiri a/k/a Amin Shirri a/k/a Amin Shiri
- 120) Imad Muhammad Cherri a/k/a Imad Muhammad Sherri a/k/a Imad Muhammad Shari a/k/a Imad Muhammad Shary a/k/a Imad Muhammad Shiri.
- 121) Khalil Abdel Hussein Cherri a/k/a Khalil Sherri a/k/a Khalil Shari a/k/a Khalil Shary a/k/a Khalil Shiri
- 122) Ali Ahmad Choueib a/k/a Ali Ahmad Shuayb /k/a 'Ali Ahmed Shuaib
- 123) Yasser Hassan Dabuq a/k/a Yaser Hasan Dabuq
- 124) Zaher Hassan Dabuq a/k/a Zaher Hasan Dabuq
- 125) Ibrahim Ali Daher a/k/a Ibrahim Ali Dahir
- 126) Kazem Abbas Darabi a/k/a Kassem Abbas Darabi a/k/a Qassem Abbas Darabi a/k/a Qasim Abbas Darabi
- 127) Ali Hussein Darwish a/k/a Ali Hussein Darwich a/k/a Ali Hussein Darwiche.
- 128) Issam Abu Darwish a/k/a Isam Abu Darwish a/k/a Issam Abu Darwich a/k/a Issam Abu Darwiche a/k/a Isam Abu Darwich a/k/a Isam Abu Darwiche
- 129) Khodr Hussein Darwish a/k/a Khoder Hussein Darwish a/k/a Khodr Hussein Darwich a/k/a Khodr Hussein Darwiche a/k/a Khodr Husayn Darwish
- 130) Muhammad Hussein Darwish a/k/a Muhammad Hussein Darwich a/k/a Muhammad Hussein Darwiche
- 131) Muhammad Issam Abu Darwish a/k/a Muhammad Issam Abu Darwich a/k/a Muhammad Issam Abu Darwiche a/ka Muhammad Isam Abu Darwish a/k/a Muhammad Isam Abu Darwich a/k/a Muhammad Isam Abu Darwiche
- 132) Safi Yahya Darwish a/k/a Safi Yahya Darwich a/k/a Safi Yahya Darwiche
- 133) Sami Issam Abu Darwish a/k/a Sami Issam Abu Darwich a/k/a Sami Issam Abu Darwiche a/k/a Sami Isam Abu Darwish a/k/a Sami Isam Abu Darwich a/k/a Sami Isam Abu Darwiche
- 134) Reza Dehnavi
- 135) Iman Abd al-Saheb Dhiyab
- 136) Zuheir Ali Dia a/k/a Zuhayr Ali Diya a/k/a Zuheir Ali Diyya a/k/a Zuheir Dia a/k/a Zuhair Diya

- 137) Hasan Dehghan Ebrahimi a/k/a Hasan Dahqan Ibrahimi a/k/a Hassan Dehghan Ebrahimi a/k/a Hassan Dahqan Ibrahimi
- 138) Raed Hamid Taher Abu Eini a/k/a Ra'ed Hameed Taher Abu 'Eini
- 139) Hamdi Zaher El Dine a/k/a Hamdi Zahreddine a/k/a Hamdi Zaher al-Din a/k/a Hamdi Jamil Zaher al-Din
- 140) Ali al-Sayyid Muhammad Hussein Fadlallah a/k/a Ali al-Sayed Mohammad Hussein Fadlallah
- 141) Karim Ibrahim Fadlallah
- 142) Muhammad Baqir al-Sayyid Abd al-Ra'uf Fadlallah
- 143) Abbas Ahmad Fahs a/k/a Abbas Ahmad Fahas
- 144) Batoul Hussein Faour a/k/a Batul Hussein Faour a/k/a Batoul Hussein Fa'ur
- 145) Hussein Ali Faour a/k/a Hussein Ali Fa'ur a/k/a Husayn Ali Fa'ur a/k/a Husayn Ali Faour a/k/a Housein Ali Faour
- 146) Youssef Muhammad Hussein Faour a/k/a Youssef Muhammad Hussein Fa'ur
- 147) Ali Khalil Faqih a/k/a 'Ali Khalil Fakih
- 148) Ibrahim Muhammad Faqih a/k/a Ibrahim Mohamed Fakih a/k/a Ibrahim Muhammad Mufid al-Faqih
- 149) Khalil Hassan Faqih a/k/a Khalil Hasan Fakih
- 150) Fadi Ali Faran a/k/a Fada Ali Farran a/k/a Faddi 'Ali Faran
- 151) Muhammad Abd-al-Amir Farhat a/k/a Muhammad 'Abd-al-Amir Farhat a/k/a Mohammad Farhat a/k/a Mohammad Abdul Amir Farhat
- 152) Muhammad Ahmad Farhat a/k/a Mohamed Ahmad Farhat
- 153) Hassan Said Farran a/k/a Hasan Sa'id Faran
- 154) Abbas Abd al-Latif Fawaz a/k/a Abbas Abdel Latif Fawaz a/k/a Abas Abdul Latif Fawaz
- 155) Abdul Latif Fawaz
- 156) Fadi Fawzi Fawaz

- 157) Fadl Abbas Fawaz
- 158) Farah Abbas Fawaz a/k/a Farah Abas Fawaz
- 159) Fouzi Reda Darwish Fawaz a/k/a Fawzi Reda Fawaz a/k/a Fawzy Fawaz a/k/a Fawzi Fawwaz a/k/a Fowzy Fawaz a/k/a Fawzy Reda Darwish-Fawaz
- 160) May Kamel Darwish Fawaz a/k/a May Kamel Darwich Fawaz
- 161) Mustafa Reda Darwish Fawaz a/k/a Mustapha Reda Darwish Fawaz a/k/a Mustapha Reda Darwish Fawaz a/k/a Moustafa Reda Darwish-Fawaz a/k/a Mustafa Fawwaz a/k/a Mustapha Fawaz a/k/a Mustapha Rida Darwich Fawaz a/k/a Mostafa Reda Darwich Fawaz a/k/a Mustapha Rhoda Darwich Fawaz a/k/a Mustafa Fawaz a/k/a Mustafa Darwish Fawaz a/k/a Moustapha Fawaz
- 162) Sadeq Abbas Fawaz a/k/a Sadiq Abbas Fawaz a/k/a Sadeq Abas Fawaz
- 163) Mahmud Fayed a/k/a Mahmoud Fayed a/k/a Mahmud Abd al-Rahman Fayed
- 164) Muhammad Abd al-Rahman Fayed a/k/a Mohamed Abdul Rahman Fayyed
- 165) Hassan Abd al-Muttalib Fneish a/k/a Hasan 'Abd-al-Matlab Funaysh a/k/a Hassan Abd al-Matlab Fneish
- 166) Said Hassan Fuani a/k/a Sa'id Hassan Fu'ani a/k/a Said Hasan Fouani
- 167) Ali Muhammad Ghandur
- 168) Abbas Hassan Gharib
- 169) Ihab Awsaf Ghurayb a/k/a Ihab Awsaf Ghreib
- 170) Carol Rogier Habib
- 171) Rana Hachem a/k/a Rana Hashem
- 172) Hasib Muhammad Hadwan a/k/a Hasib Hadwan a/k/a Hajj Zayn
- 173) Khadir Ali Abi Haidar a/k/a Kader 'Ali Abi Haydar
- 174) Muhammad Ni'mah al-Hajj a/k/a Mohamed Nemeh El Hajj
- 175) Ali Ahmad Halawi a/k/a 'Ali Ahmed Halawi
- 176) Fuad Halawi a/k/a Fuad Mahmud Halawi a/k/a Fu'ad Mahnud Halawi
- 177) Mahmud Fuad Halawi a/k/a Mahmoud Fuad Halawi a/k/a Mahmoud Fouad Halawe

- 178) Rawad Halawi a/k/a Rawad Halawe a/k/a Rawad Mahmud Halawi
- 179) Wa'el Halawi a/k/a Wa'el Halawe a/k/a Wael Halawi a/k/a Wael Halawe
- 180) Isam Nabih Hamad a/k/a Issam Nabi Hamad Issam a/k/a Nabi Hamd
- 181) Moussa Ali Hamdan a/k/a Musa Ali Hamdan
- 182) Talal Hamiyah a/k/a Talal Husni Hamiya
- 183) Ahmad Mustafa Mahmoud Hammoud a/k/a Ahmad Mustafa Mahmud Hammoud
- 184) Muhammad Hassan Hammoud a/k/a Mohamed Hasan Hamud
- 185) Abbas Hussein Harb a/k/a Abbas Husayn Harb
- 186) Ali Hussein Harb a/k/a Ali Houssein Harb a/k/a Ali Husayn Harb
- 187) Chekri Harb a/k/a Chekri Mahmoud Harb
- 188) Dib Hani Harb a/k/a Deeb Hani Harb
- 189) Khalil Yusif Harb a/k/a Hajj Ya'taqad Khalil Harb a/k/a Mustafa Khalil Harb a/k/a Sayyid Ahmad a/k/a Abu Mustafa
- 190) Mostafa Habib Harb a/k/a Mustafa Habib Harb
- 191) Youssef Hashim a/k/a Yusuf Hashem a/k/a Yusef Hashem
- 192) Ali Abdel Reda Hassan a/k/a Ali Abd al-Rida Hussein
- 193) Samir Subhi Abu-Hassan a/k/a Samir Subhi Abu Hasan a/k/a Samer Subhi Abu Hassan a/k/a Samer Subhi Abu Hasan
- 194) Muhammad Ali Hawi a/k/a Mohamed 'Ali Hawi
- 195) Tareq Ali Hawi a/k/a Tarek 'Ali Hawi
- 196) Ali Kassem Hejeij a/k/a Ali Kassem Hajij a/k/a Ali Kassem Hujayj a/k/a Ali Qassem Hejeij a/k/a Ali Qasem Hejeij a/k/a Ali Qasim Hejeij a/k/a Ali Qassim Hejeij a/k/a Ali Qassem Hajij a/k/a Ali Qasem Hajij a/k/a Ali Qasim Hajij a/k/a Ali Qassim Hajij a/k/a Ali Qassem Hujayj a/k/a Ali Qasem Hujayj a/k/a Ali Qasim Hujayj a/k/a Ali Qassim Hujayj
- 197) Fatima Kassem Hejeij a/k/a Fatima Qasem Hjeij a/k/a Fatima Qassem Muhammad Hjeij a/k/a Fatima Qasim Hejeij

- 198) Hassan Hejeij a/k/a Hassan Muhammad Hejeij a/k/a Hassan Hajij a/k/a Hassan Hujayj a/k/a Hassan Hejeij a/k/a Hassan Hejeij a/k/a Hassan Hejeij a/k/a Hassan Hejeij a/k/a Hassan Hajij a/k/a Hassan Hajij a/k/a Hassan Hajij a/k/a Hassan Hajij a/k/a Hassan Hujayj a/k/a Hassan Hujayj a/k/a Hassan Hujayj a/k/a Hassan Hujayj
- 199) Kassem Hejeij a/k/a Kassem Muhammad Hejeij a/k/a Kassem Hajij a/k/a Kassem Hujayj a/k/a Qassem Hejeij a/k/a Qasem Hejeij a/k/a Qasim Hejeij a/k/a Qassim Hejeij a/k/a Qassem Hajij a/k/a Qasem Hajij a/k/a Qasim Hajij a/k/a Qassim Hajij a/k/a Qassem Hujayj a/k/a Qasem Hujayj a/k/a Qasim Hujayj a/k/a Qassim Hujayj
- 200) Nasamah Ahmad Hejeij a/k/a Nasamah Ahmad Hajij a/k/a Nasama Ahmad Hejeij a/k/a Nasama Ahmad Hajij a/k/a Nessma Ahmad Hejeij
- 201) Nada Hassan Hijazi a/k/a Nada Hasan Hijazi
- 202) Samir Muhammad Hijazi a/k/a Samir Mohamed Hijazi
- 203) Hassan Hodroj a/k/a Hasan Hodrouj
- 204) Ayman Ahmad Ibrahim
- 205) Khalil Nazem Ibrahim a/k/a Khalil Nazim Ibrahim a/k/a Khalil Nadhem Ibrahim
- 206) Ahmad Ali Ismail a/k/a Ahmed 'Ali Isma'il
- 207) Ali Ahmad Ismail a/k/a 'Ali Ahmed Isma'il
- 208) Ibrahim Abdallah Ismail a/k/a Ibrahim Abdullah Ismail
- 209) Nasrin Ali Ismail a/k/a Nisreen 'Ali Isma'il
- 210) Talib Husayn Ali Jarak Ismail a/k/a Talib Hussein Ali Jarak Ismail a/k/a Talib Husayn 'Ali Jarak Ismai'l
- 211) Ziyad Ali Ismail a/k/a Ziad Ali Ismail a/k/a Ziyad 'Ali Isma'il
- 212) Ibrahim Waked Issa a/k/a Ibrahim Waked Isa a/k/a Ebrahim Waked 'Issa
- 213) Ha'el Ahmad Issawi a/k/a Ha'el Ahmad Issaoui a/k/a Ha'il Ahmad Issawi
- 214) Hussein Ahmad Issawi a/k/a Hussein Ahmad Issaoui
- 215) Ibrahim Ahmad Issawi a/k/a Ibrahim Issawi a/k/a Ibrahim Issaoui
- 216) Lama Hussein Bdeir Issawi a/k/a Lama Hussein Bdeir Issaoui
- 217) Wa'el Ahmad Issawi a/k/a Wa'el Ahmad Issaoui a/k/a Wael Ahmad Issawi a/k/a Wael Ahmad Issaoui a/k/a Wa'il Ahmad Issawi

- 218) Walid Ali Jaber a/k/a Waleed 'Ali Jaber
- 219) Najmah Hassan Jabir a/k/a Najmeh Hassan Jaber a/k/a Najmah Tajideen.
- 220) Muhammad Fayyad Jafal
- 221) Bashir Qassem Jaffal a/k/a Bashir Qasim Jaffal a/k/a Bashir Qasem Jaffal a/k/a Bashir Kassem Jaffal
- 222) Ahmad Abd al-Karim Said Muhammad Jawad
- 223) Hana Abd al-Karim Jawad
- 224) Hussein Abd al-Muttalib Jawad a/k/a Husayn Abdulmutalab Jawad a/k/a Hussein Abd-al-Matlab Jawad a/k/a Husayn Abd al-Mutalib Jawwad
- 225) Akram Saied Joumaa a/k/a Akram Said Joumaa a/k/a Akram Sa'id Joumaa.
- 226) Anwar Saied Joumaa a/k/a Anwar Said Joumaa a/k/a Anwar Sa'id Joumaa.
- 227) Ayman Saied Joumaa a/k/a Ayman Said Joumaa a/k/a Aiman Said Jomaa Kharfan a/k/a Ayman Sa'id Joumaa
- 228) Mohamad Saied Joumaa a/k/a Mohamad Said Joumaa a/k/a Mohamad Sa'id Joumaa a/k/a Muhammad Said Joumaa
- 229) Muhammad Taha Jumaa
- 230) Muhammad al-Mukhtar Fallah Kallas a/k/a Muhammad al-Mukhtar Kallas a/k/a Mohamad El Mokhtar Kallas a/k/a Mohamed Kallas
- 231) Hasan Antar Karaki a/k/a Hassan Karaki a/k/a Hassan Qaraki
- 232) Azam Abd-al-Aziz Kawtharani
- 233) Adnan Hussein Kawtharani a/k/a Adnan Mahmud Kawtharani a/k/a Adnan Kutherani
- 234) Muhammad Kawtharani a/k/a Muhammad al-Kawtharani a/k/a Jafar Al-Kawtharani
- 235) Hanna Elias Khalifa a/k/a Hanna Khalifeh
- 236) Ali Muhammad Kharrubi a/k/a Ali Mohamed Kharroubi a/k/a Ali Kharoubi
- 237) Jamal Muhammad Kharrubi a/k/a Jamal Muhammad Kharroubi a/k/a Jamal Mohamad Kharoubi

- 238) Iman Kobeissi a/k/a Iman Kobeissu, a/k/a Iman Kobreissi-Ghadry a/k/a Iman Qubaysi
- 239) Saad Habib Lahud
- 240) Michel Gabriel Ma'rawi a/k/a Michael Gabriel Ma'rawi
- 241) Khadijah Amin Mahmoud a/k/a Khadijah Amine Mahmood
- 242) Ahmad Muhammad Makke a/k/a Ahmad Muhammad Makki
- 243) Hisham Hussein Makke a/k/a Hisham Hussein Makki a/k/a Hisham Husayn Makke a/k/a Hisham Husayn Makki a/k/a Hisham Mackie.
- 244) Jamal Makke a/k/a Jamal Makki
- 245) Fawzi Muhammad Malek a/k/a Faouzi Malek a/k/a Fawzi Malik
- 246) Johanna Malek a/k/a Johanna Malik
- 247) Ramzi Muhammad Malek a/k/a Ramzi Malik
- 248) Randa Muhammad Malek a/k/a Randa Malik
- 249) Wajih Masoun Maliki a/k/a Wajih Masoun al-Maliki
- 250) Adel Mansour a/k/a Adel Mansur a/k/a Adel Muhammad Mansour
- 251) Muhammad Yusuf Ahmad Mansur a/k/a Sami Hani Shihab a/k/a Salem Bassem Sami a/k/a Jamal Hani Hillawi a/k/a Muhammad Yusuf Mansur Sami Shihab a/k/a Mohammad Yousef Mansour a/k/a Mohammad Youssef Mansour a/k/a Muhammad Yusuf Mansur a/k/a Mohammad Yusuf Ahmad Mansur a/k/a Muhammad Yusuf Ahmad Mansur a/k/a Sami Shehab a/k/a Sami Shihab a/k/a Hani Halawi
- 252) Khadijah Hassan Mattar a/k/a Khadijah Hassan Matar a/k/a Khadijah Taj al-Din a/k/a Khadijah Tajideen
- 253) Fadi George Mazegi a/k/a Fadi Maziji
- 254) Michel George Mecattaf
- 255) Ahmad Izzat Khalil Muhammad a/k/a Ahmad Izzat Khalil Mohamad a/k/a Ahmed Izzat Khalil Mohammad
- 256) Said Jamil Muhammad
- 257) Jaafar Musa Musa a/k/a Ja'afar Musa Musa a/k/a Jaafar Musa Moussa

- 258) Tarek Khalil Musa a/k/a Tarek Khalil Moussa
- 259) Razi Musavi a/k/a Hosein Razi Musavi a/k/a Hussein Razi Musavi
- 260) Ali Musa Nachar a/k/a Ali Moussa Nachar a/k/a Ali Musa Nashar
- 261) Ghazi Kamel Abd al-Rahman Abu Nahl a/k/a Ghazi Abunahl a/k/a Ghazi K. Abu Nahl
- 262) Fuad Haidar Najm a/k/a Fu'ad Haidar Najem
- 263) Hasan Nasrallah a/k/a Hassan Abd-al-Karim Nasrallah
- 264) Abdul Menhem Ibrahim Nassour a/k/a Abd-al-Mun'im Ibrahim Nassur
- 265) Ali Ibrahim Nassour
- 266) Aziz Ibrahim Nassour
- 267) Batul Hassan Youssef Nassour a/k/a Batul Hassan Youssef a/k/a Batul Hasan Yusuf
- 268) Hassan Ibrahim Nassour
- 269) Ibrahim Khalil Nassour
- 270) Khalil Ibrahim Nassour
- 271) Muhammad Ibrahim Nassour
- 272) Sahar Ibrahim Nassour
- 273) Imad Chukrallah Nasrallah a/k/a Emad Shukralla Nasralla
- 274) Muhammad Mustafa Nur-al-Din a/k/a Mohamad Nouredine a/k/a Muhammad Nouredine
- 275) Jawad Nur-al-Din a/k/a Jawad Nouredine a/k/a Jawad Nouredine Shawki Jawad Mohamad Shafiq Nur al-Din a/k/a Shawqi Jawad Mohamad Shafiq a/k/a Shawqi Muhammad Shafiq Nur Al-Din
- 276) Samih Ossaily
- 277) Ali Rauf Osseiran a/k/a Ali Ra'uf Osseiran a/k/a Ali Rauf Oserian
- 278) Hasan Chehadeh Othman
- 279) Naim Qassem a/k/a Sheikh Naim Qassem a/k/a Naim Qasim a/k/a Naim Kassem a/k/a Na'im Kasem

- 280) Adnan Muhammad Ali Qassir a/k/a Adnan Muhammad Ali Qasir
- 281) Ali Qassir a/k/a Ali Ghasir a/k/a Ali Ghassir a/k/a Ali Kassir a/k/a Ali Qasir a/k/a Ali Abd-Al-Rahman Qasir
- 282) Burhan Hussein Qataya
- 283) Ali Muhammad Qansu a/k/a Ali Muhammad Kanso a/k/a Ali Muhammad Kansou
- 284) Jihad Muhammad Qansu a/k/a Jihad Muhammad Kanso a/k/a Jihad Muhammad Kansou
- 285) Muhammad Haidar Qansu a/k/a Muhammad Haidar Kanso a/k/a Muhammad Haidar Kansou
- 286) Ali Qasir a/k/a Ali Abd-Al-Rahman Qasir a/k/a Ali Ghasir a/k/a Ali Ghassir a/k/a Ali Kassir a/k/a Ali Qasir
- 287) Abd Al Menhem Qubaysi a/k/a Abd al-Mun'im al-Qubaysi a/k/a Abd al-Mumin Qubaysi a/k/a Abd Al Menhem Kobeissi a/k/a Abd Al Menhem Qubaysi a/k/a Abd Al Munhim Kubaysy a/k/a Abdul Menhem Kobeissy a/k/a Abdul Menhem Kobeissi a/k/a Abdel Menhem Kobeissi
- 288) Fatima Ahmad Qubaysi a/k/a Fatima Ahmad Qbeisi a/k/a Fatima Ahmad Qbaysi
- 289) Kassem Rmeiti a/k/a Kassem Ali Remiti a/k/a Qassim Rmeiti a/k/a Qassim Remiti a/k/a Qasem Rmeiti a/k/a Qasem Remiti a/k/a Qassem Rmeiti a/k/a Qassem Remiti
- 290) Muhammad Abd Ali Rustam a/k/a Mohammad Abd Ali Rustum a/k/a Mouhamad Abd Ali Rostom a/k/a Mohamad Abd Ali Rostam
- 291) Tony Saab a/k/a Tony Butrus Saab a/k/a Tony Boutros Saab a/k/a Tony Sa'b a/k/a Tony Butrus Sa'b
- 292) Abdul Latif Saad a/k/a Abdul Latif Sa'ad
- 293) Abd al-Karim Ahmad Saad a/k/a Abd al-Karim Ahmad Sa'ad
- 294) Ahmad Saad a/k/a Ahmad Sa'ad
- 295) Anwar Hussein Saad a/k/a Anwar Hussein Sa'ad
- 296) Issam Ahmad Saad a/k/a Issam Ahmad Sa'ad a/k/a Isam Ahmad Saad a/k/a Isam Ahmad Sad a/k/a Isa, Ahmad Sa'ad
- 297) Edmond Youssef Saadeh a/k/a Edmond Yusuf Saade

- 298) Ahmad Ibrahim Safa a/k/a Ahmed Ibrahim Safa
- 299) Wafiq Safa a/k/a Wafiq Abd al-Hussein Safa a/k/a Wafiq Abdul Hussein Safa a/k/a Wafiq 'Abd-al-Husayn Safa a/k/a Wafiq Ahmad Safa a/k/a Wafik Ahmed Safa a/k/a Hessam Badr al-Din a/k/a Hessam Badreddine a/k/a Ali Wahib al-Zayn a/k/a Ali Waheb al-Zein
- 300) Abdallah Ali Safieddine a/k/a Abdallah Safi-Al-Din a/k/a Abdullah Safieddine a/k/a Abdullah Safi-Al-Din
- 301) Hamzah Ali Safieddine a/k/a Hamzah Safi-Al-Din a/k/a Hamzeh Ali Safieddine a/k/a Hamza Ali Safieddine
- 302) Hashem Safieddine a/k/a Hashem Safi Al-Din a/k/a Hashem Safi A-Din a/k/a Hashim Safi Al Din a/k/a Hashim Safi Al-Din a/k/a Hashim Safieddine
- 303) Kassem Mohamad Saleh a/k/a Qasim Saleh a/k/a Qasem Saleh a/k/a Qassem Salah a/k/a Kassim Muhammad Saleh
- 304) Oussama Salhab a/k/a Usama Salhab a/k/a Osama Salhab.
- 305) Ibrahim Amin Salman
- 306) Sobhi Mohamed Saqr a/k/a Sobhi Sakr
- 307) Elissar Hussein Sayegh a/k/a Elissar Husayn Sayegh
- 308) Hussein Tawfiq Sayegh
- 309) Wahid Mahmud Sbeiti
- 310) Fadi Hussein Serhan a/k/a Fadi Husayn Serhan
- 311) Ali al-Sha'ir
- 312) Rauf Ali Shaito a/k/a Rauf Ali Sha'itu a/k/a Raouf Ali Shaito a/k/a Rauf Ali Shi'itaw a/k/a Rauf Ali Cheaito
- 313) Attallah Jamil Shaito a/k/a Attallah Jamil Sha'itu a/k/a Attallah Jamil Shi'itaw a/k/a Attallah Jamil Cheaito
- 314) Kassem Muhammad Shams a/k/a Qassim Muhammed Shams a/k/a Qassem Muhammed Shams a/k/a Kassem Muhammad Chams a/k/a Qassim Muhammed Chams a/k/a Qassem Muhammed Chams a/k/a Hajj Kassem Shams

- 315) Hassan Shateri a/k/a Hussam Khoshnevis a/k/a Hessam Khoshnevis a/k/a Hesam Khosh-Nevis a/k/a Hesaam Khosh-Nevis a/k/a Hesam Khoshnevis a/k/a Hassan Khoshnvis a/k/a Hussam Khosh a/k/a Hussam Khouchnoyess.
- 316) Jamal Husayn Abd Ali Abd-al-Rahim al-Shatti a/k/a Jamal Hussein Abd Ali Abd-al-Rahim al-Shatti
- 317) Ibrahim Shibli a/k/a Ibrahim Chibli a/k/a Ibrahim Chebli
- 318) Kifah Sleiman
- 319) Wahid Mahmud Subayti a/k/a Wahid Sbeity a/k/a Wahid Sbeiti
- 320) Hassan Ali Suwaydan a/k/a Hasan 'Ali Suwaidan
- 321) Adham Hussein Tabaja a/k/a Adham Tabajah a/k/a Adham Husayn Tabaja a/k/a Adham Husayn Tabajah
- 322) Ahmad Ali Tabaja a/k/a Ahmad Ali Tabajah a/k/a Ahmes 'Ali Tabajah.
- 323) Ali Adham Tabaja a/k/a Ali Adham Tabajah
- 324) Ali Hussein Tabaja a/k/a Ali Hussein Tabajah
- 325) Bassam Muhammad Tabaja a/k/a Bassam Muhammad Tabajah
- 326) Batul Adham Tabaja a/k/a Batul Adham Tabajah a/k/a Batoul Adham Tabaja
- 327) Fatima al-Zahra Adham Tabaja a/k/a Fatima Tabajah
- 328) Hassan Hussein Tabaja a/k/a Hassan Hussein Tabajah
- 329) Hussein Abd al-Rida Tabaja a/k/a Hussein Tabajah
- 330) Romel Hussein Tabaja a/k/a Romel Hussein Tabajah a/k/a Romel Husayn Tabaja a/k/a Romel Husayn Tabajah
- 331) Wala Tabaja a/k/a Wala Tabajah
- 332) Hoda Hussein Saad a/k/a Huda Hussein Saad a/k/a Hoda Saad Tajideen a/k/a Hoda Tajiddine a/k/a Hady Husayn Sa'd a/k/a Houda Hussein Saad a/k/a Huda Saad Tajeddine a/k/a Hoda Hussein Sa'ad a/k/a Huda Saad a/k/a Huda Sa'ad a/k/a Hoda Sa'ad Tajideen
- 333) Abdallah Youssef Tajideen a/k/a Abdallah Youssef Taj al-Din
- 334) Ahmad Muhammad Tajideen a/k/a Ahmad Muhammad Taj al-Din

- 335) Ali Ibrahim Tajideen a/k/a Ali Ibrahim Taj al-Din
- 336) Ali Muhammad Tajideen a/k/a Ali Muhammad Taj al-Din
- 337) Fatimah Muhammad Tajideen a/k/a Fatimah Muhammad Taj al-Din
- 338) Hassan Ali Tajideen a/k/a Hassan Ali Taj al-Din
- 339) Hasan Muhammad Tajideen a/k/a Hasan Muhammad Taj al-Din
- 340) Hussein Ali Tajideen a/k/a Hussein Ali Taj al-Din a/k/a Husyan Ali Taj al-Din
- 341) Jaffar Muhammad Tajideen a/k/a Jaffar Muhammad Taj al-Din
- 342) Kassim Muhammad Tajideen a/k/a Kassem Muhammad Tajideen a/k/a Qassim Muhammad Tajideen a/k/a Qassem Muhammad Tajideen a/k/a Qassem Taj al-Din a/k/a Qassei Taj al-Din
- 343) Mahmoud Muhammad Tajideen a/k/a Mahmoud Muhammad Taj al-Din
- 344) Muhammad Kassim Tajideen a/k/a Muhammad Taj al-Din
- 345) Nadin Hassan Tajideen a/k/a Nadin Hassan Taj al-Din a/k/a Nadine Hassan Tajideen
- 346) Samiha Ibrahim Tajideen a/k/a Samiha Ibrahim Taj al-Din
- 347) Youssef Muhammad Tajideen a/k/a Youssef Muhammad Taj al-Din a/k/a Yousif Taj al-Din
- 348) Zahara Ali Tajideen a/k/a Zahara Ali Taj al-Din
- 349) Muhammad Tarhini a/k/a Al Sayed Bilal
- 350) Abbas Musallam Wahbah
- 351) Imad Ramez Wazani a/k/a Imad Ramez Wazne
- 352) Nabila Ya'qub Wazni a/k/a Nabila Ya'qub Wazne
- 353) Ahmad Mohamad Yazbeck a/k/a Ahmah Yazbeck a/k/a Ahmad Yazbek
- 354) Muhammad Yazbek a/k/a Muhammad Yazbeck a/k/a Mohammed Yazbik a/k/a Hosein Assaf a/k/a Mohammad Yazbeck a/k/a Mohammad Yazbeck a/k/a Muhammad Yazbick a/k/a Muhammad Yazbak a/k/a
- 355) Ibrahim Mahmoud Youssef a/k/a Ibrahim Mahmood Youssef a/k/a Ibrahim Mahmud Yusif

- 356) Ismael Mohammed Youssef
- 357) Ziyad Muhammad Youssef a/k/a Ziad Muhammad Yusef a/k/a Ziad Mohammad Youssef
- 358) Mohammad Reza Zahedi a/k/a Muhammad Reza Zahedi a/k/a Ali Reza Zahedi a/k/a Reza Mahdavi a/k/a Mohammad Riza Zahdi a/k/a Hasan Mahdawi
- 359) Ali Zeaiter a/k/a Ali Hussein Zuaytar a/k/a Ali Zoeiter, a/k/a Ali Zu'ayter, a/k/a Ali Zu'aytar, a/k/a Ali Husayn Zu'aytir
- 360) Haidar Saadallah Zgheib
- 361) Ali Zuraik a/k/a Ali Hassan Zreik a/k/a Ali Zraiq a/k/a Ali Zurayq a/k/a Ali Zreik

b. Entities:

- 1) ACE Group SAL
- 2) Ad-Diyar Trading and Contracting SARL
- 3) Advanced Sports Center – ASC SAL
- 4) Afri Belg Comercio E Industria LDA a/k/a AFRI BELG a/k/a AFRI-BELG SUPERMERCADOS a/k/a CASH & CARRY RETAIL STORES a/k/a AFRI BELG CONSTRUCTION a/k/a AFRI BELG AGRICULTURE.
- 5) African Fish Company (Offshore) SAL
- 6) Africa Invest Company (Offshore) SAL
- 7) Africa Middle East Investment Holding SAL
- 8) African Star (Belgium)
- 9) Afrimex (Offshore) SAL a/k/a Afrimex
- 10) Afrostars Diamonds BVBA a/k/a Afrostars Diamond (Belgium)
- 11) Ahmad Diamond Corporation (Belgium)
- 12) Alpha-Beta (Belgium)
- 13) Al-Amana SARL
- 14) Al-Ataa Company – Hassan Bazoun & Partners

- 15) Al-Aytam Company for General Trading and Fuels a/k/a Aytam Petroleum
- 16) Al-Dalhamiya Country Club Company
- 17) Al-Hadi Institution
- 18) Al-Kawthar
- 19) Al-Inmaa Engineering and Contracting SARL a/k/a Al-Inmaa Group for Engineering and Contracting a/k/a Inmaa 'Al' for Engineering and Contracting SARL
- 20) Al-Inmaa General Contractors SARL
- 21) Al-Inmaa Group for Tourism Works
- 22) Al-Inmaa for Entertainment and Leisure Projects
- 23) Al-Izdihar for Contracting SARL
- 24) Al-Jarha Association a/k/a Wounded Association a/k/a Muassasat Al-Jarha
- 25) Al-Jiyeh for Tourism & Construction SAL
- 26) Al-Mabarrat Charitable Society a/k/a Benevolent Charity Society
- 27) Al Mansouri Real Estate Company
- 28) Al-Massar Real Estate SAL
- 29) Al-Omran SARL
- 30) Al-Qard al-Hassan Association a/k/a Al-Quard Al-Hassan Association; a/k/a Al-Quardh Al-Hassan Association; a/k/a Karadh Al-Hassan
- 31) Al-Saad Trading Est
- 32) Al-Sirat Holding SAL
- 33) Al-Taaoun Medical SAL
- 34) Al-Yaqout Restaurant
- 35) Al Yumun Real Estate Company SAL
- 36) Ali Ahmed Group – Holding SAL
- 37) Alia Company SAE

- 38) Amana Plus Company SAL
- 39) Amana Sanitary and Paints Company LLC ASPCO
- 40) Amasko Offshore SAL
- 41) Amigo Supermarket Ltd. (Nigeria)
- 42) Anar Belgium NV (Belgium)
- 43) Arab Lebanese Trading & Contracting Company
- 44) Aramoun 1506 SAL
- 45) Arch Consulting SARL
- 46) ASA Diam NV (Belgium)
- 47) ASA International (Belgium)
- 48) Assaha International Group (Offshore) SAL
- 49) Assaha Travel and Tourism SARL
- 50) Atilla SAL
- 51) Atlas Holding SAL
- 52) Atlas for Trade and Industry Ltd.
- 53) Aya SAL Offshore
- 54) Bank Saderat (Iran)
- 55) Bank Saderat Plc (United Kingdom)
- 56) Bayt al-Mal a/k/a Bayt al-Mal Lil Muslimeen
- 57) Beirut Diam SAL
- 58) Beirut Gem SAL
- 59) Beirut Trade SAL
- 60) Best Diamond House DMCC (UAE)
- 61) Béton Plus SAL

- 62) Béton Liban SARL (a/k/a BL SARL)
- 63) Bexley Way General LCC
- 64) B.I. Group Holding SAL
- 65) Blue City SAL
- 66) Blue Star Diamonds a/k/a Blue Star Diamond Offshore SAL
- 67) BMI 482 SAL
- 68) Bream Star Line SAL Offshore
- 69) Builders International SAL
- 70) Caesars Park Hotel
- 71) Capital SAL
- 72) Car Care Center a/k/a CCC a/k/a Car Care Center Company a/k/a Mikalab SARL
- 73) Car Escort Services (Offshore) SAL a/k/a Car Escort Services SAL Offshore
- 74) Cedar Gems SARL
- 75) Central Motors SPRL (Democratic Republic of the Congo)
- 76) Centrum Mark SAL
- 77) Cetco Group SAL
- 78) Cheaito Group SARL
- 79) City Park SARL
- 80) City Pharma SARL
- 81) Cleany & Company SARL
- 82) Company for Development and Prosperity
- 83) Compass Insurance Company SAL
- 84) Compu House SARL
- 85) Congo Diam SPRL (Democratic Republic of the Congo)

- 86) Congo Futur SPRL (Democratic Republic of the Congo)
- 87) Cooperative Al-Wafaa SARL
- 88) Damour 850 SAL
- 89) DARCO a/k/a DARCO Safi Darwish and Partners
- 90) Dbouk International for Printing and General Trading
- 91) Debbiye 143 SAL
- 92) Development Studies SARL
- 93) Diamonds Forever SAL
- 94) Distributions and Agencies Company SAL
- 95) DITREX Diamonds DMCC
- 96) E.B.D. Group Holding SAL
- 97) EBD Teltac (Offshore) SAL
- 98) Echogem (Belgium)
- 99) Egimex NV (Belgium)
- 100) Elissa Exchange Co. SARL
- 101) Elissa Group SA (Benin)
- 102) Elissa Holding SAL
- 103) Elissa Megastore (Benin)
- 104) Elissa Park Cotonou/Elissa Car Park (Benin)
- 105) Enmaa Dalhamiya Company SAL a/k/a Delhamieh Development, a/k/a Deliku
- 106) ETCIMEX (Czech)
- 107) Energy Engineers Procurement and Construction
- 108) Epsilon Trading FZE (UAE)
- 109) Euro African Group Ltd. (The Gambia)

- 110) European & African Society of Investments & Export (Belgium)
- 111) Ezzideen Diamonds BVBA (Belgium)
- 112) Family House SARL
- 113) Family Park SARL
- 114) Fantasy World SARL
- 115) Farah Trading Company for Iron & Building Materials SAE
- 116) Farah Travels Company SARL a/k/a Farah Company for Tourism
- 117) Farah Tyre Company
- 118) Fastlink SAL
- 119) Fayed Exchange Co.
- 120) Frand Trading Est Company
- 121) Fun World Company SAL a/k/a Aalam al-Marah Co SAL
- 122) G & S Diamonds a/k/a G&S Diamond FZE (UAE)
- 123) Galaxy Flame Trading SAL Offshore
- 124) GAM Petroleum
- 125) Gas Transport and Storage SARL
- 126) Gebaa 2480 SAL
- 127) General Investment Co SARL
- 128) Global Cleaners SARL
- 129) Global Electrical Group Holding SAL
- 130) Global Supply and Consultancy SAL Offshore
- 131) Global Trading Group NV (Belgium)
- 132) Global Touristic Services SAL “GTS”
- 133) Golden Eye Trading a/k/a ithalat ihracat Kagit Ltd (Turkey)

- 134) Golden Hall a/k/a Société Golden Hall a/k/a Tabaja Wazni & Co SCS
- 135) Golden Square SAL
- 136) Golfrate Holdings (Angola) LDA
- 137) Goodwill Charitable Organization a/k/a Educational Development Association a/k/a Al-Shahid Social Association
- 138) Gresco for Contracting and Trading Company SARL
- 139) Grupo Arosfran Empreendimentos E Participacoes SARL a/k/a Grupo Arosfran (Angola)
- 140) Halawi Exchange Co.
- 141) Halawi Holding SAL
- 142) Halawi Investment Trust SAL
- 143) Halawi Real Estate SAL
- 144) Halawi Trading & Contracting Est
- 145) Hassan Ayash Exchange Company
- 146) Hijazi Trading Establishment
- 147) Hoda for Touristic Services & Management Holding SAL
- 148) Hiram Maritime SAL
- 149) Ideal Development I.D. SAL
- 150) Imam Khomeini Relief Committee a/k/a Islamic Charitable Emdad Committee a/k/a Imam Khomeini Relief Organization a/k/a Islamic Charity Emdad a/k/a Islamic Emdad Charitable Committee a/k/a Comite Islamique Daides Et De Biem Liban a/k/a Imam Khomeiny Aid Committee a/k/a Imdad Islamic Association Committee for Charity a/k/a Islamic Charity Emdad Committee a/k/a Emdad Assistance Foundation a/k/a Emdad Committee for Islamic Charity a/k/a Imdad Committee for Islamic Charity a/k/a Imdad Association of the Islamic Philanthropic Committee a/k/a Al-Imdad a/k/a Imam Khomeini Support Committee a/k/a Imam Khomeini Emdad Committee a/k/a Imam Khomeini Imdad Committee a/k/a Komite Emdad Emam a/k/a Imam Khomeini Foundation a/k/a Khomeini Social Help Committee a/k/a Khomeini Charitable Foundation
- 151) Imperial Heals SAL

- 152) Impulse International SAL Offshore
- 153) Info Trust SAL
- 154) Info Trust SARL
- 155) Inter Aliment SAL Offshore
- 156) Interafrica Trading Company a/k/a ITC SAL Offshore a/k/a ITC
- 157) International Contractors and Developers SAL
- 158) International Group Holding SAL
- 159) Investment Group for Construction and Development SAL
- 160) Iqaruna (Holding) SAL a/k/a Ikaruna (Holding) SAL a/k/a Akkaruna SAL Holding
- 161) Iqaruna Projects and Development Holding a/k/a/ Ikarouna Projectes & Development (Holding) SAL
- 162) Islamic Resistance Support Organization a/k/a IRSO a/k/a Islamic Resistance Support Association a/k/a Hay'at Da'am al-Muqawama al-Islamiya Fi Lubnan a/k/a Hayat Al-Dam Lil-Muqawama Al-Islamiya
- 163) Jihad al-Bina a/k/a Jihad Al Binaa a/k/a Jihadu-I-Binaa a/k/a Construction for the Sake of The Holy Struggle a/k/a Construction Jihad a/k/a Struggle for Reconstruction a/k/a Jihad Construction Institution a/k/a Jihad Construction Foundation a/k/a Jihad-Al-Binaa Association a/k/a Holy Construction Foundation a/k/a Jihad Construction
- 164) Kairaba Supermarket a/k/a Kairaba Shopping Centre (The Gambia)
- 165) Kassem Rmeiti & Company for Exchange a/k/a Rmeiti Exchange a/k/a Qassim Remiti & Co. for Exchange
- 166) K.I. Group SAL Offshore (KI Group)
- 167) King Charcoal SARL
- 168) King Company for Manufacturing Trading Building Materials SARL
- 169) Kohinoor SAL
- 170) Kohinoor SARL
- 171) Kosmeo Limitada (Mozambique)

- 172) Labico SAL Offshore
- 173) Lama Foods International Offshore SAL
- 174) Lama Foods SARL
- 175) L'ambiance de Rêve SARL
- 176) La National SAL
- 177) La Voile Sur Mer SARL
- 178) Leaders of Supply & Products (Offshore) SAL
- 179) Lebanese-Arab Company for Touristic Services SARL
- 180) Lebanese Bread & Confectionery Company SAL
- 181) Lebanese Communication Group
- 182) Lebanese Development & Investment Company LLC
- 183) Lebanese Printing Company SAL a/k/a Dar al-Farabi SAL
- 184) Lebanese Real Estate Development & Investment Company SAL
- 185) M. Marine SAL Offshore
- 186) Madan Tourism Projects Company SAL a/k/a Madan Tourism Projects Company SAL "Green City" a/k/a Green City a/k/a Mudun Tourism Projects Company SAL "Green City" a/k/a Moudon SAL
- 187) Madina SAL Offshore
- 188) MAH Auto (New Jersey/USA)
- 189) Maher Trading and Construction Company a/k/a Maher Trading and Engineering a/k/a Maher Company
- 190) Martyrs Foundation a/k/a Shahid Foundation, a/k/a Mua'assasat al-Shahid a/k/a Ashahid a/k/a Aschahid Association a/k/a Hizballah Martyrs Foundation a/k/a Lebanese Martyr Foundation a/k/a Al-Mua'assat Al-Shahid a/k/a Al-Shahid Foundation a/k/a Al-Shahid Charitable and Social Organization a/k/a Al-Shahid Organization a/k/a Lebanese Martyr Association a/k/a Islamic Revolution Martyrs Foundation a/k/a Martyrs Institute
- 191) Matrix (Offshore) SAL

- 192) Meamar Company for Engineering and Development SARL
- 193) Mecattaf SAL
- 194) Mecattaf Holding SAL
- 195) Mectafinance AG
- 196) Mectapharm SAL
- 197) Mecattaf Trading Co SAL
- 198) Mecatafonciere SAL
- 199) Medical Aid (Offshore) SAL a/k/a MEDAID
- 200) Medical Cooperation Co SAL a/k/a Al Taaoun Medical SAL a/k/a Al Khiam Hospital SAL a/k/a Al Khiyam Hospital
- 201) Medical Equipments and Drugs International Corporation SAL “MEDIC”
- 202) Metro Trading Company a/k/a Metro Trading SARL a/k/a Metro Trading Company Offshore SAL
- 203) Mercury 3670 SARL
- 204) Mercury Development Group (Holding) SAL
- 205) Mercury Development Offshore SAL
- 206) Metropolitan Security SAL
- 207) MGM Construction SAL
- 208) Millenium Diamond SPRL (Democratic Republic of Congo)
- 209) Millenium Diamond Offshore SAL
- 210) Minocongo SPRL (Democratic Republic of Congo)
- 211) Mirage for Engineering and Trading
- 212) Mirage for Waste Management and Environmental Services SARL
- 213) Mirath SAL
- 214) Monte Carlo Beach Company SAL

- 215) National Crushers Company SAL
- 216) Nest Contracting Company SAL
- 217) New All Pharma SARL
- 218) New Land SARL
- 219) New Line Exchange Trust Company SAL
- 220) New Roads Company SARL
- 221) Noumayriye 1057 SAL
- 222) Nour Holding SAL
- 223) Nura Palace SAL
- 224) Oil and Gas Consulting Services SAL Offshore
- 225) One Globe Operator SAL Holding
- 226) Ovlas Trading SA (Lebanon and British Virgin Islands)
- 227) Ovlas Trading SAL (Offshore)
- 228) Pain Victoire a/k/a Société Générale des Pains a/k/a Pains Victoire a/k/a Pan Victoire a/k/a Société Générale Des Pains SPRL a/k/a Société Générale De Pain a/k/a Bread Victory (Democratic Republic of the Congo)
- 229) Paloma Group SAL
- 230) Phoenicia Shipping Offshore SAL
- 231) Platinum Residence a/k/a Muhammad Bdeir and Co.
- 232) Premier Investment Group SAL Offshore
- 233) Prime Bank (The Gambia)
- 234) Primeira Gema Comercio Importacao e Exportacao Ltda (Brazil)
- 235) Primo International NV (Belgium)
- 236) Primo International SAL Offshore
- 237) Primogems a/k/a Primogems SPRL (Democratic Republic of Congo)

- 238) Primo-Gem SPRL (Democratic Republic of Congo)
- 239) Pure Diam DMCC SAL Offshore
- 240) Ras Beirut 1442 SAL
- 241) Rayan Foods SAL
- 242) Rayan (Offshore) LLC
- 243) REEM Pharmaceutical SAL
- 244) Rifieh Pour L'amélioration a/k/a Rural Real Estate Improvement SARL)
- 245) Rilton Traders a/k/a Rilton Traders FZCO
- 246) Rmeiti Group SAL Offshore
- 247) Rmeiti Exchange a/k/a Qassim Remiti & Co. for Exchange a/k/a Kassem Rmeiti & Co. for Exchange
- 248) Romagro Cereal SRL (Romania)
- 249) Safrimex SPRL (Democratic Republic of Congo)
- 250) Salasko Offshore SAL
- 251) SAM Diamonds
- 252) Sanabel for Urban Studies and Architectural Design SAL
- 253) Sanovera Pharm Company SARL
- 254) Sea & Palm SARL
- 255) Seasons Corporation for Agricultural Projects and Services SARL
- 256) Seguibat SA
- 257) Shahed Pharm Drugstore SARL
- 258) Shams Exchange Company - Ali Muhammad Shams and Partners a/k/a Shams Company for Exchange Ali Mohammed Shams & Partners a/k/a Ali Mohamed Chams & Partner a/k/a Ali Mohamed Chams and Partner a/k/a Chams Exchange.
- 259) Sierra Gas SAL Offshore

- 260) Sierra Gem Diamonds NV (Belgium)
- 261) Signum International Holding SAL
- 262) S.I.M. SAL Offshore
- 263) Sky Star (Democratic Republic of Congo)
- 264) Soafrimex BV (Belgium)
- 265) Société 4252 SAL Offshore
- 266) Société Allure SARL
- 267) Société de Construction et de Financement a/k/a Socofi BTP (Gabon)
- 268) Société Financière de Banque SARL a/k/a Sofibanque (Democratic Republic of Congo)
- 269) Société Foncière Al Ghaba SAL
- 270) Société Nationale De Services Et Demplois SARL – SNSE
- 271) Société Orientale Libanaise d’Investissement et Développement SAL “SOLID”
- 272) Société Rmeiti SARL a/k/a STE Rmeiti
- 273) Socimex SPRL (Democratic Republic of Congo)
- 274) Socitrans
- 275) Soficom SPRL (Democratic Republic of Congo)
- 276) SOGEAC SPRL (Democratic Republic of Congo)
- 277) Sol Blanc SAL
- 278) SOL – MAR SARL a/k/a SOL-MAR SAE a/k/a Solmar SARL
- 279) Solmar Offshore SAL
- 280) Sourans Diamonds (Belgium)
- 281) Spectrum International Investment Holding SAL
- 282) Spectrum Investment Group Holding SAL
- 283) Spectrum (Offshore) SAL

- 284) Spider Group SAL
- 285) Stars Communications Ltd.
- 286) Stars Communications (Offshore) SAL
- 287) Stars Group Holding SAL
- 288) Stars International Ltd. (China)
- 289) Tajco Company Ltd. a/k/a Tajco Company SARL a/k/a Tajco Company LLC a/k/a Senesco Banjul (The Gambia)
- 290) Tajco Company SAE
- 291) Tajideen Building and Construction Enterprise a/k/a Tajideen Establishment for Building & Construction
- 292) Team 5 (Holding) SAL
- 293) Technoplast Industrial & Trading Company SARL
- 294) Teleserve Plus SAL
- 295) Teltac Worldwide Incorporated (Offshore) SAL
- 296) Terina Jewelry SARL
- 297) Thaingui SAL Offshore
- 298) The New Millennium for Middle East and Africa SAL
- 299) Trade Point International SARL
- 300) Trading Development Company SARL a/k/a Trading Development Co. SAE a/k/a Commercial Development Company SARL
- 301) Tradium Holding SAL
- 302) Trans-Gazelle SPRL a/k/a Transgazelle a/k/a Trans Gazelle SPRL (Democratic Republic of Congo)
- 303) Trans-M SPRL (Democratic Republic of Congo)
- 304) Triple A Diamonds NV (Belgium)
- 305) Triple A for Development Company SAL

- 306) Triple A International SPRL (Democratic Republic of Congo)
- 307) Triple A Team Ltd. a/k/a Triple A Team SARL
- 308) Trust Compass Insurance SAL a/k/a Compass Insurance Company SAL
- 309) Union Real Estate Development Company SAL
- 310) Unique Stars Mobile Phones LLC (UAE)
- 311) United Company for Insurance Services SARL
- 312) United Investment Group SAL
- 313) V69 Real Estate SAL
- 314) Valencia SARL
- 315) Vatech SARL
- 316) Waisenkindersprojekt Libanon e.V. a/k/a Orphans Project Lebanon (Germany)
- 317) Wanour Real Estate SAL
- 318) Wonderland Amusement Park and Resort Ltd. (Nigeria)
- 319) World Trade Center Beirut
- 320) Yousser Company for Finance and Investment
- 321) 5 Rosas Comércio e Indústria Limitada SAL Offshore a/k/a 5 Rosas Comercio E Industria Lda Sal Offshore a/k/a 5 Roses Trading and Manufacturing Limited SAL Offshore.

Exhibit B

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

KATHALEEN FREEMAN, et al.

Plaintiff

v.

HSBC HOLDINGS PLC, et al.

Defendant

Civil Action No. 18-cv-7359 (PKC)(CLP)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

KBC USA

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Place: Osen LLC, 190 Moore Street, Suite 272
Hackensack, NJ 07601
Attn.: Ari Ungar, Esq.

Date and Time:

03/15/2024 10:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 02/15/2024

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Ari Ungar

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) _____ Plaintiffs
_____, who issues or requests this subpoena, are:

Ari Ungar, Osen LLC, 190 Moore Street, Suite 272, Hackensack, NJ 07601, aungar@osenlaw.com, (201) 265-6400

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 18-cv-7359 (PKC)(CLP)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

SCHEDULE A

INSTRUCTIONS

1. In producing Documents and other materials, You are to furnish all responsive documents, electronically stored information, and tangible things in Your possession, custody, or control, regardless of whether such Documents or materials are possessed directly by You or by Your directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, attorneys, advisors, representatives, and other personnel, acting on Your behalf or under Your control.

2. Documents attached to other Documents, including but not limited to transmittal memoranda, routing slips, letters, comments, or post-it notes, shall be produced.

3. As provided in the Federal Rules of Civil Procedure, You shall produce the Documents and materials in full in the file folder, envelope, or other container or enclosure in which they are kept, maintained, or stored in the ordinary course of business.

4. You shall produce the original of each Document, along with all non-identical copies and drafts of such Document. Spreadsheets of representative transactions created in response to this subpoena may not be substituted for copies of the original transactional records.

5. You shall produce the metadata in each Document and any log files and message queues relating to each Document.

6. The relevant time period with respect to each Document Request herein is January 1, 2003, through December 31, 2021.

7. If any requested Document cannot be produced in full, You are to produce it to the extent possible, identifying which Document or portion of a Document is being withheld, and the reason that Document is being withheld.

8. When information subject to the Document Request is withheld on a claim that it is privileged or otherwise subject to protection from production, such claim shall be made expressly and shall be supported by an identification of the nature of the Documents, communications, or things not produced, sufficient to enable the demanding party, and the Court if necessary, to properly evaluate the claim.

9. To the extent You are uncertain of the scope of terms such as “customer due diligence” or “customer risk profile” you are referred to the Department of the Treasury, Financial Crimes Enforcement Network (2016), “Customer Due Diligence Requirements for Financial Institutions,” final rules (RIN 1506-AB25), Federal Register, vol. 81 (May 11), p. 29403, and 31 CFR 1020.210(a)(2)(v)(A) and 31 CFR 1010.610.

10. If additional information would be helpful in reducing the administrative burden of the subpoena, please contact Plaintiffs’ counsel. Contact information is provided on the Federal Rule of Civil Procedure 45 (form) cover sheet. For example, if you believe your administrative burden will be reduced by deferring production of non-transactional records, Plaintiffs’ counsel will be happy to discuss potential stages of production.

11. In searching the names of persons identified below, You shall also search other commonly used transliterations of Arabic names, including without limitation:

Baqir	Baker, Baaqir, Baqer, Baaker, Baaqer
Darwish	Darvish, Darwich, Darwiche
Hoda	Huda, Houda, Houdaa, Hodaa, Hudaa, Hady
Hussein	Husain, Hussain, Husayn, Husein
Issam	Isam, Issaam, Esam, Esaam, Essaam, Esame, Esamm, Esamme, Esaame, Esaamm, Esaamme
Issawi	Isawi, Issaoui
Kassim	Qasim, Qaasim, Qazeem, Quasim, Casim, Cassim, Kacem, Kasem, Kassem, Kassym, Qasem, Kasim, Qassim, Ghasem, Kassam, Qazeem, Kaseem, Kasseem, Qaseem, Kasim, Qazim

Muhammad	Mohammad, Mohamad, Mohamed, Mohammed, Muhammed, Muhamad, Muhamed, Mohummad, Mohummed, Mouhamed, Mohammad, Mouhamad, Mohamud
Musa	Moosa, Musaa, Moosaa, Musaa, Mousa, Mousaa, Moussa, Mowsa, Mowsaa, Muwsa, Muwsaa, Moosa
Nazim	Nazem, Nadhem, Nadhim, Nathum
Said	Sayed, Saeed, Saed, Saied, Sai'd, Sa'id
Saleh	Salah, Salih, Sahlay, Sauleh
Seada	Saada
Tajideen	Tajeddine, Taj al-Din, Tajudeen
Wa'el	Wael, Wa'il, Wail, Wael, Waail, Waeil, Waele, Waelle, Wael, Waaill
Ya'qub	Yakub, Yaqub, Yaacoub, Yaqoob, Yaqoub, Yakoub, Yakup, Yukub, Yakubbe, Yakoob, Yakob, Jakob, Yacob, Jacob, Yakube, Yakubb, Yakubbe, Yakub
Youssef	Yusuf, Yussuf, Yosef, Yoosuf, Yusif, Yusef, Yoosef, Yousuf, Yousef, Yosoph, Yosof, Yosouf, Yosuwf, Yosowf, Yosuph, Yosuf, Yousof, Yousouf

12. For Your convenience, satisfaction of this subpoena's request for responsive documents may be accomplished by producing, or consenting to the transmittal of, the same information You previously produced in response to the subpoena served on you in *Bartlett v. Société Générale De Banque Au Liban SAL*, No. 19-cv-7 (CBA) (VMS), to the Plaintiffs in this Action.

DEFINITIONS

1. For purposes of this subpoena, "You" and "Your" refer, individually and collectively, to the recipient(s) of this subpoena, KBC Group N.V., KBC USA, and to any of their branches, subsidiaries, parents, successor entities, predecessor entities, or agents or representatives thereof, including, but not limited to, officers, directors, attorneys, employees, advisors and any other persons acting on their behalf or under their control.

2. "Transactional record" includes any S.W.I.F.T. Messages, CHIPS Payment Messages, FedWire Payment Messages, Continuous Linked Settlement (CLS) Bank Messages, Telex Messages, and any internal payment system messages reflecting requests for or actual

payments, payment orders, bills of exchange, checks including interbank checks, financial institution transfers, including banknote transfers, documentary credits and guarantees, bank guarantees, letters of credit, and other wholesale transfers of value, regardless of whether they are or were blocked by law or Your policies.

3. “Compliance Records” means documents, including memoranda, internal reports, know-your-customer, customer due diligence and customer risk profiles but excludes Suspicious Activity Reports.

4. “Defendant” means Société Générale De Banque Au Liban SAL, Fransabank SAL, MEAB Bank SAL, Blom Bank SAL, Byblos Bank SAL, Bank Audi SAL, Bank Of Beirut Sal, Lebanon and Gulf Bank SAL, Banque Libano-Française SAL, Bank of Beirut and the Arab Countries SAL, Fenicia Bank, Lebanese Canadian Bank SAL, and Jammal Trust Bank, SAL.

5. “Participant” means any entity with any role in or who appears in any way in a transaction, including as a bank for a participant.

DOCUMENTS REQUESTED

1. All Transactional Records that are or were located in the United States relating to any of the following persons and entities (including other known names in parentheses), in which You are a Participant:¹

a. Persons:

- i. Abdel Karim Youssef Ahmad.
- ii. Adel Hassan Makki Ahmad (Adel Hassan Makki).
- iii. Afif Ahmad Ahmad.
- iv. Ali Ahmad Ahmad.
- v. Ali Sa'id Ahmad.
- vi. Ali Said Ali Ahmad.
- vii. Diana Nassour Ahmad (Diana Nassour).
- viii. Hassan Said Ali Ahmad.

¹ A list of names can be provided in extractable digital form such as Excel if it is of assistance in complying with the subpoena. For any responsive documents relating to Defendant Jammal Trust Bank SAL, you are asked to preserve said documents, but need not produce them at this time.

- ix. Hussein Said Ali Ahmad.
- x. Ibtisam Said Ali Ahmad.
- xi. Imad Suleiman Ahmad.
- xii. Issam Suleiman Ahmad.
- xiii. Hind Abbas Ahmad.
- xiv. Hussein Said Ali Ahmad (Hussein Ahmad).
- xv. Lina Ahmad Ahmad.
- xvi. Mahmoud Nayef Ahmad.
- xvii. Maya Ahmad.
- xxviii. Muhammad Said Ali Ahmad.
- xix. Muhsin Ali Ahmad.
- xx. Muna Said Ali Ahmad.
- xxi. Musa Ahmad Ahmad.
- xxii. Musa Muhammad Ahmad.
- xxiii. Nadia Ahmad Ahmad.
- xxiv. Nawal Ali Ahmad.
- xxv. Nazim Said Ali Ahmad (Nazim Ahmad) (Nazem Ibrahim Ahmad).
- xxvi. Rasha Ali Ahmad.
- xxvii. Said Ali Ahmad.
- xxviii. Salman Ali Ahmad.
- xxix. Seada Said Ali Ahmad.
- xxx. Sleiman Ali Ahmad.
- xxxi. Suleiman Ali Ahmad.
- xxxii. Taysir Suleiman Ahmad.
- xxxiii. Youssef Ali Ahmad.
- xxxiv. Abd al-Ilah Mahmud Ashur.
- xxxv. Saleh Ali Assi.
- xxxvi. Nour al-Ain Muhammad Ali Atweh (Nur al-Ayn Muhammad Ali Utwah, Nour Tajideen).
- xxxvii. Hussein Ali Atwi.
- xxxviii. Imad Abdul Reda Bakri.
- xxxix. Rami Kamil Ya'qub Baqir.
- xl. Rim Reda Baqir.
- xli. Rima Kamil Ya'qub Baqir.
- xlii. Muhammad Ibrahim Bazzi.
- xliii. Wa'el Bazzi.
- xliv. Ali Hussein Darwish.
- xlvi. Fadi Ali Faran (or Fada Ali Farran).
- xlvi. Rana Hachem.
- xlvi. Samir Muhammad Hijazi.
- xlvi. Hussein Ahmad Issawi.
- xlvi. Ibrahim Ahmad Issawi (Ibrahim Issawi).
- l. Najmah Hassan Jabir (Najmeh Hassan Jaber, Najmah Tajideen).
- li. Hisham Hussein Makki.
- lii. Fawzi Malek.
- liii. Johanna Malek.

- liv. Ramzi Muhammad Malek.
- lv. Randa Muhammad Malek.
- lvi. Fadi George Mazegi.
- lvii. Yusuf Abbas Mer'i.
- lviii. Abdul Menhem Ibrahim Nassour.
- lix. Ali Ibrahim Nassour.
- lx. Aziz Ibrahim Nassour.
- lxi. Batul Hassan Youssef Nassour.
- lxii. Hassan Ibrahim Nassour.
- lxiii. Ibrahim Khalil Nassour.
- lxiv. Khalil Ibrahim Nassour.
- lxv. Muhammad Ibrahim Nassour.
- lxvi. Sahar Ibrahim Nassour.
- lxvii. Samih Ossaily.
- lxviii. Hoda Hussein Saad (Huda Saad Tajideen).
- lxix. Ahmad Muhammad Tajideen.
- lxx. Ali Muhammad Tajideen.
- lxxi. Hasan Muhammad Tajideen.
- lxxii. Hassan Tajideen.
- lxxiii. Kassim Tajideen (Kassim Muhammad Tajideen).
- lxxiv. Muhammad Tajideen.

b. Entities:

- i. ACE Group SAL.
- ii. Afri Belg Commercio E Industria LDA.
- iii. Africa Middle East Investment Holding SAL.
- iv. African Star.
- v. Afrimex (Offshore) SAL.
- vi. Afrostars Diamonds BVBA or Afrostars Diamond.
- vii. Ahmad Diamond Corporation.
- viii. Alpha-Beta.
- ix. Al-Sirat Holding SAL.
- x. Ali Ahmed Group – Holding SAL.
- xi. Anar Belgium NV.
- xii. ASA Diam NV.
- xiii. ASA International.
- xiv. Beirut Diam SAL.
- xv. Beirut Trade SAL.
- xvi. Blue City SAL.
- xvii. Blue Star Diamonds and Blue Star Diamond Offshore SAL.
- xviii. Car Escort Services (Offshore) SAL.
- xix. Congo Futur SPRL.
- xx. Diamonds Forever SAL.
- xxi. DITREX Diamonds DMCC.
- xxii. Echogem.
- xxiii. Egimex NV.

- xxiv. Elissa Company.
- xxv. ETCIMEX.
- xxvi. Energy Engineers Procurement and Construction.
- xxvii. Euro African Group Ltd.
- xxviii. European & African Society of Investments & Export.
- xxix. Ezzideen Diamonds BVBA.
- xxx. G & S Diamonds.
- xxxi. Global Trading Group NV.
- xxxii. Golden Square SAL.
- xxxiii. Golfrate Holdings (Angola) LDA.
- xxxiv. Grupo Arosfran Empreendimentos E Participacoes SARL (Grupo Arosfran).
- xxxv. Hijazi Trading Establishment.
- xxxvi. Kohinoor SAL.
- xxxvii. Metro Trading Company, Metro Trading SARL, and Metro Trading Company Offshore SAL.
- xxxviii. Ovlas Trading SA.
- xxxix. Paloma Group SAL.
 - xl. Premier Investment Group SAL Offshore.
 - xli. Primeira Gema Comercio Importacao e Exportacao Ltda.
 - xl.ii. Primo International NV and Primo International SAL Offshore.
 - xl.iii. Primogems, Primogems SPRL, and Primo-Gem SPRL.
 - xl.iv. Pure Diam DMCC SAL Offshore.
 - xl.v. Rilton Traders and Rilton Traders FZCO.
 - xl.vi. SAM Diamonds.
 - xl.vii. Sierra Gem Diamonds NV.
 - xl.viii. Soafrimex BV.
 - xl.ix. Socimex SPRL.
 - l. Sourans Diamonds.
 - li. Spider Group SAL.
 - lii. Terina Jewelry SARL.
 - lii.iii. Trade Point International SARL.
 - lii.iv. Triple A Diamonds NV, Triple A International SPRL, and Triple A Team Ltd.
 - lii.v. United Investment Group SAL.
 - lii.vi. Voltra Transcor Energy BVBA.

2. All Compliance Records that are or were located in the United States relating to any of the persons and entities (including other known names in parentheses) listed above in Request No. 1.